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January 24, 2019

Plumas National Forest
Attn: Katherine Carpenter
159 Lawrence Street, Quincy, CA 95971

Please accept the following comments on behalf of the California Off-Road Vehicle Association (CORVA), our members, member clubs and partners, and our business sponsors. The submission of these comment does not prevent the above entities from submitting substantive comments thereby obtaining legal standing for this analysis.

There are significant problems that must be initially addressed regarding this Draft Environmental Impact Statement (DEIS) by the Plumas National Forest (forest).

1. The first issue concerns the absence of public meetings, in addition to the inability of the public to obtain information necessary for the submission of substantive comments pertaining to the DEIS from the forest before the end of the comment period. Although this was caused by a partial government shutdown, it still leaves the public at a distinct disadvantage. The intent of the National Environmental Policy Act (NEPA) is to encourage members of the public to be involved in federal analyses by submitting substantive comments, thereby assisting federal agencies with decision-making. The forest must recognize this significant problem and allow additional comments to be accepted into the public record on this analysis after the partial government shutdown is over. Freedom of Information Act requests have gone unanswered, which can be understood in the greater context of the partial government shutdown, but does not obviate the forest from their responsibilities for a NEPA process that aligns with the intent of the act.
2. The second issue concerns the fact that the DEIS was released more than three years after the initial Notice of Intent was released to the public by the forest in October of 2015. Public scoping for this project was concluded shortly afterwards. No additional scoping was pursued by the forest before the release of the DEIS in 2018, so this document is based on 3-year-old, out-of-date information. Relevant and topical information, including any changes in snowfall patterns which might dictate changes in areas considered highly desirable for motorized recreational use were therefore unavailable to the forest to help develop the current DEIS and the Proposed Action. To the dismay of the public, the forest supervisor was not open to receiving pertinent updates regarding forest conditions by members of the public (see issue #4) But to the credit of the forest, the staff was very open to receiving substantive information

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during the comment period. This openness, while appreciated, does not make up for the missed opportunity for renewed outreach to the community.

3. The third issue is a disregard for the serious concern that diminishing OSV opportunity represents to OSV enthusiasts. This Subpart C NEPA document is supposed to be a motorized over-snow opportunity analysis, that should not exhibit a marked preference for non-motorized over-snow enthusiasts or greatly diminish motorized opportunities. Conversely, this DEIS portrays non-motorized activity as morally superior to motorized OSV opportunities, which violates the multiple use mandate of the Forest Service. It also violates the Subpart C supplemental rule released in January 2015 that delineated the required procedural framework for all forests engaged in OSV analyses.

The 2015 rule clearly states; "Regulation of non-motorized use.....is beyond the scope of this final rule, which addresses motorized use, specifically, OSV use."

The forest has failed to produce a valid DEIS because much of the document proposes serious reduction to OSV accessible acreage by alleging a supposed negative effect by continued OSV access on non-motorized opportunities. It also takes verbal reports of conflict as fact, rather than thinly disguised examples of ideological bias against motorized recreation. NEPA analyses must be based on fact, not on ideology and certainly not on rumor and/or innuendo.

Moreover, some of the language regarding impacts for non-motorized recreation in this DEIS stretch the credulity of the public. "Consuming untracked powder" is a term taken directly from Snowlands Network, an organization dedicated to the removal of OSV on forested lands, and repeated ad nauseum in the document. According to Dictionary.com, 'consuming' is defined as; "to destroy or expend by use; use up". Snowmobiles, the most popular vehicle used for OSV recreation, do not destroy or expend snow. Snowmobiles do not devour or eat snow, which is an additional definition for the word 'consume'. This is manufactured propaganda that has no place in a Forest Service DEIS that should be based on the best available science.

4. The fourth issue that must be addressed is the lack of a true No Action Alternative. A No Action Alternative is required in all NEPA analyses because it serves as a baseline that enables the public to directly compare the Proposed Action to current conditions. This alternative should reflect current management guidelines. The DEIS incorrectly states that minimum snow depth requirements exist under "current management, which is an incorrect statement. DEIS at xvi (Table S 2) For this forest, the public was

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unable to engage in meaningful comparison because NEPA requires a No Action Alternative for a good reason, and the forest failed to provide this to the public.

5. The fifth issue concerns the poor leadership by former Forest Supervisor Daniel Lovato, which includes arbitrary decision-making and lack of planning acumen. Supervisor Lovato, besides dealing poorly with the motorized public and displaying an ideological preference for non-motorized forms of recreation during his tenure at the Plumas National Forest, refused to listen when confronted with facts regarding forest planning. Supervisor Lovato created some of the serious issues inherent in the DEIS including serious violations of the 1988 LRMP.

Substantive Comments

ROS and Land and Resource Management Plan (LRMP) Inconsistencies

Several areas are not designated open to OSV use due to being also designated as Semi-Primitive RX-8/ (and allegedly) Semi-Primitive Non-Motorized in the existing LRMP.

Thompson Peak (Pg 99)

Chips Creek (Pg 101)

Grizzly Peak (Pg 102)

Adams Peak (Pg 103)

Middle Fork Semi-Primitive and Inventoried Roadless Area (Pg 105)

These areas are not designated in the LRMP as Semi-Primitive, Non-Motorized. The site-specific management guidelines in the LRMP exclusively list these areas as subject to management prescription Rx-8 (Semi-Primitive). The Management Area Direction Portion of the LRMP, Pages 4-113 through 4-298 contain the specific management directions for these areas, specifically list them as prescription Rx-8, and in no way reference appendix R, where the only definition of the ROS SPNM is found, but it has no ties whatsoever to specific areas.

In addition to Prescription RX-8, the ORV zone designations are clearly defined on the LRMP preferred alternative, with all of the above areas designated as Zone B. Zone B designations clearly provide for over snow motorized vehicle use.¹

¹ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd509738.pdf



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Rx-8 . Semi-Primitive Area Prescription

Description: This prescription applies to essentially undisturbed areas to maintain a remote forest setting and allow non-motorized, dispersed recreation. Activities are permitted only if they are unobtrusive and maintain the character of the area. The prescription applies to the following roadless areas:

<u>Roadless Areas</u>	<u>Acreage ^{1/}</u>
Bald Rock	5,200
Beartrap	6,000
Chips Creek	12,700
Dixon Creek	3,000
Grizzly Peak	7,000
Keddie Ridge	3,000
Lakes Basin	13,600
Middle Fork	27,000
Thompson Peak	2,000
Total	79,500

^{1/} Does not include Bucks Lake Wilderness and the Middle Fork Wild River acreage.

GENERAL DIRECTION

STANDARDS AND GUIDELINES

Recreation

Provide for dispersed recreation (1a).

Manage all lands basically in accordance with the ROS class of SPNM.

Provide opportunities for activities such as hiking and walking, horseback riding, viewing scenery, camping, hunting, nature study, mountain climbing, swimming, fishing, cross-country skiing, and snowshoeing.

Provide both hiking and horseback riding routes in and to the areas.

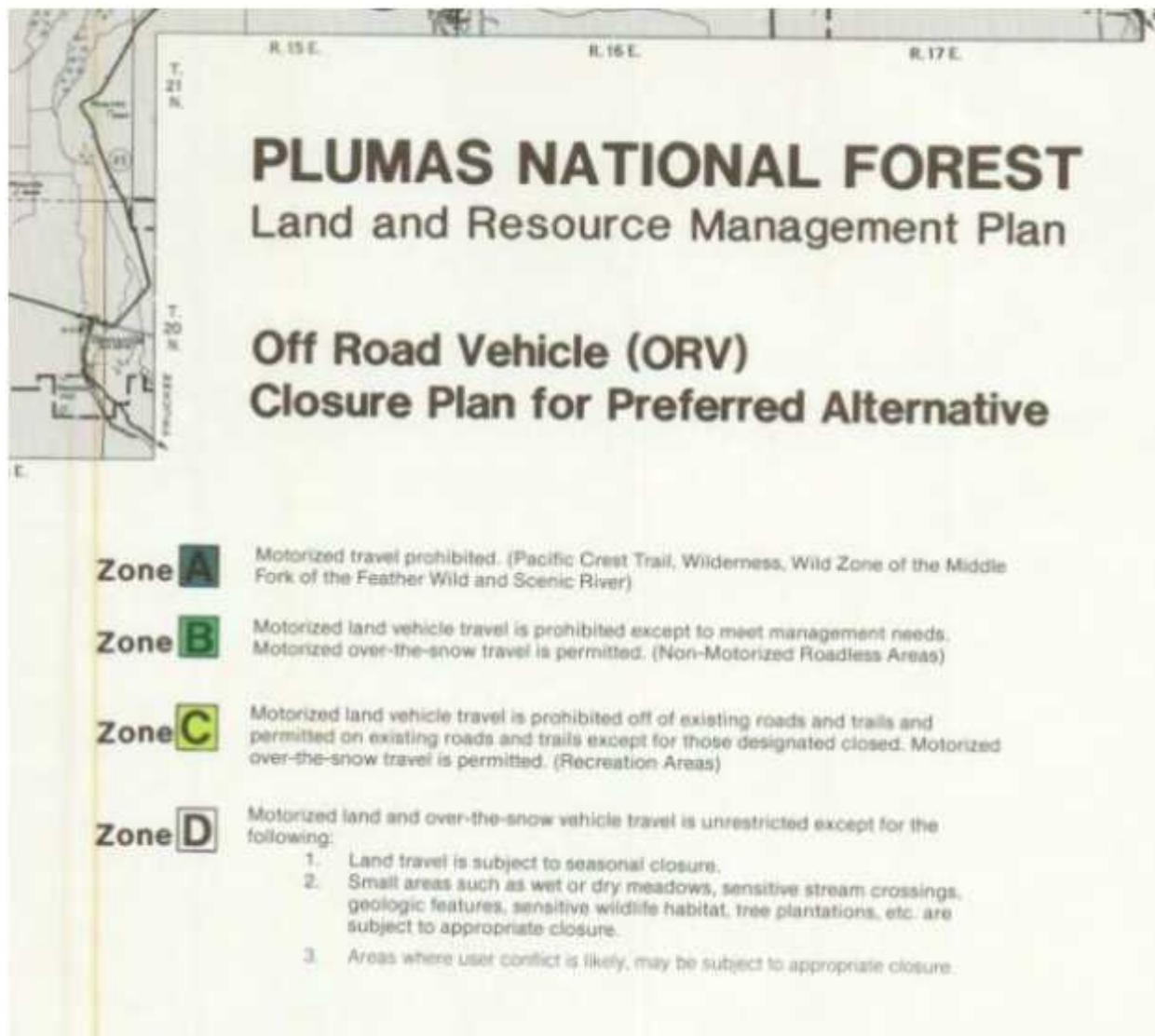
Provide a non-motorized experience (1a).

Allow no motorized travel except over-the-snow and management access.



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The above is reiterated in Vol 2 of the DEIS on page 47.² Clearly Rx-8, ORV zones B, and the desired ROS 6 management guidelines for the above areas include OSV use. These designations also appear on the preferred alternative ROS map from the LRMP.³



² https://www.fs.usda.gov/nfs/11558/www/nepa/101835_FSPLT3_4448657.pdf

³ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd509739.pdf

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The above document clearly establishes that these areas:

Grizzly Ridge
Thompson Peak
the south side of Keddie Ridge
Fowler Lake
Buzzard Roost Ridge, (all categorized as zones B)

Northwest portion of the Lakes Basin area including:

- a) The Jamison creeks basin
- b) Mt Elwell
- c) Smith Lake
- d) Florentine Canyon

The Beartrap Mtn Roadless area
Adams Peak
Snake Lake
Butterfly Valley

...were designated as open to motorized over the snow vehicle use, regardless of summer time motorized designations. The 1988 planning documents the obvious differences between summer motorized, and over the snow motorized vehicle use were properly recognized.

Remedy: since no LRMP amendments are proposed in this DEIS, any and all proposed closures to OSV access in the document must be restored. Failure to comply will result in a document out of compliance with the LRMP.

Lack of Economic Analysis Regarding Impacts of Proposed Action on Local Economies

The Forest Service touts its '3-legged stool' of sustainability, which requires forests to include an analysis of socioeconomic impacts in all NEPA decisions. The forest arbitrarily excluded a serious analysis of potential negative effects of the Proposed Action to OSV recreation dependent businesses, and failed to list this as a Significant Impact.

The forest erroneously concluded there would be little change in socioeconomic conditions for local businesses or communities surrounding the forest regardless of which alternative was chosen. It is clear that the socio-economic specialist did not speak with representatives from the local counties and small towns surrounding the forest.

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It appears that this chapter in the DEIS, along with much of the other material in Chapter 3, was prepared by the Forest Service Enterprise Team, and not by this forest, because the material does not adequately represent local concerns or local issues.

Remedy: the forest must conduct a true socioeconomic impact study and include the inevitable potential for negative socioeconomic consequences for all alternatives.

Snow Depth Restrictions

The Final Rule acknowledges that, when properly operated, snowmobiles “do not make direct contact with soil, water, and vegetation”. Rather than use arbitrary snow depth measurements or try to define the term; “adequate snow”, which may change morning to afternoon, the DEIS should simply state that 36 CFR 261.15(h) will be used to write citations in cases where resource damage has been caused by OSV users. (The document should also include a statement that resource damage done by nonmotorized users will also be cited using the above CFR, although a true Subpart C analysis should not contain management prescriptions to non-motorized recreation).

The term “adequate snow” should more accurately be defined as the depth of snow that is required to operate a snowmobile according to manufacturers’ recommendations. Manufacturers recommend a snow depth that will protect the machine, which in reality is the same amount of snow that is needed to protect resources. Arbitrary snow depth measurements would only represent a futile attempt by the forest to limit rather than manage OSV, and could open up the Forest Service to lawsuits.

Such a definitive measurement, when presented as a firm requirement or recommendation by the forest welcomes outside critique confirmation of conditions by opponents of OSV recreation. An argument can realistically be made that opponents of OSV will be conducting independent measurement checks of snow depths on a regular basis, and presenting them to the forest as evidence that OSV enthusiasts may have (unknowingly) violated agency policy.

Enforcement based on resource damage would eliminate the inherent problems with snow depth measurement which may include:

- Lack of personnel to measure snow depths throughout the forest on a daily basis.
- Timely posting of snow depth to websites, including weekends and holidays when staff may not be available.

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- The knowledge that LEOs cannot write a citation based on snow depth merely because it is stated in the ROD. They can only cite 36 CFR 261.15(h).

Attempting to use snow depth restrictions only complicates the issue and creates mistrust of the agency. CORVA challenges the analysis that snow depth is necessary for public safety, because snowmobilers are well aware of the risks and avoid unsafe conditions which may damage their machine and/or cause unnecessary risk to themselves.

The DEIS also fails to provide a definition for fails to define “resource damage”, which is necessary to guide OSV users to prevent damage to resources. There is also no analysis in the DEIS of a minimum snow depth for non-motorized over snow recreation, since those forms of recreation also have the potential to cause resource damage. In shallow snow conditions, it is common to see ski tracks through muddy areas. The Subpart C Final Rule issued in January 2015 states; “Unlike other types of motor vehicles traveling cross-country, OSVs generally do not create a permanent trail or have a direct impact on soil and ground vegetation”.

Remedy: CORVA objects to snow depth restrictions because they are unnecessary, unenforceable, arbitrary, and unsupported by science. More importantly, they are not required by the Travel Management Subpart C Final Rule. The Final Rule only states OSV use may be designated “where snowfall is adequate for that use to occur”. Adequate snow to prevent resource damage can range anywhere from a depth of 2 inches of ice to 2 feet of bottomless powder. A simple measurement of depth is inadequate to “protect resources”, which is the main purpose of this project as stated in the Purpose and Need.

Arbitrary Proposal to Eliminate OSV Opportunity in Lower Elevations

There is no scientific information presented in the DEIS to support the decision to eliminate OSV opportunities below 3500' elevation. There is no adequate justification for this decision, therefore it falls under the definition of an arbitrary proposal.

In one fell swoop, the forest eliminated OSV opportunity throughout the forest with no scientific basis for the decision. Since other forests in Forest Service Region 5 proposed similar restrictions based on elevation, rather than conclude this proposal was based on site specific or scientific information, CORVA is forced to conclude this was a proposal made by the Enterprise Team that supplied information for much of the DEIS.

Without a care, the forest showed complete disregard for OSV enthusiast enjoyment and opportunity. No one has a crystal ball that will indicate where snow is likely to fall or when snow is likely to fall. California experienced 4 years of drought followed by a year of record

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snowfall, confounding all previously stated expert opinions on projected snowfall. Eliminating OSV under any predetermined elevation is a solution in search of a problem. It is unconscionable for the forest to restrict access simply based on an office exercise. Subpart C of Travel Management does ask the responsible official to designate areas with adequate snow depth. The term 'adequate snow depth' is often misunderstood. The agency is not asking the responsible official to know what the future has to hold in regards to snow patterns or snowfall amounts.

Rather the responsible official must designate all areas that have historical use for OSV recreation, regardless of elevation. To do otherwise would indicate the responsible official has inside information in regards to future weather patterns. If snowfall is sparse during any given year, snowmobile recreation will not occur.

Remedy: restore OSV access to all areas of the forest regardless of elevation. Snowfall amounts will dictate when and where OSV activity can safely occur based on manufacturer's recommendation for operation of snowmobiles.

Conflict

The document contains information regarding supposed conflict between OSV and non-motorized enthusiasts that is rife with negative innuendo, supposition and ideology. The forest has presented no true factual information, but instead has succeeded in painting a negative picture of OSV recreation and OSV enthusiasts.

The DEIS fails to prove there is a problem with the existing OSV system and fails to prove there have been any reported instances of true conflict other than ideological conflict. A NEPA analysis has to be based on the best available science, and the forest fails to prove that conflict is anything more than hearsay. While the Travel Management Rule does compel the forest to consider public safety and conflict concerns, if the forest finds there are no factual, documented problems with the existing system in regards to public safety and conflict the forest must conclude that no justification exists for changing the current OSV system.

Remedy: all changes in the Proposed Actions base on hearsay regarding conflict must be removed from the document. Decisions based on hearsay, innuendo and ideology are inappropriate for a NEPA document based on the best available science.

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Pacific Crest Trail

The DEIS proposes to institute a buffer zone on either side of the Pacific Crest Trail. This proposal violates the National Scenic Trails Act of 1968. When debating the language and management goals for National Scenic Trails, including the PCT, Congress very specifically considered existing recreation opportunities. The following text was included in the National Scenic Trails act of 1968 and the PCT Comprehensive Plan of 1982;

"Development and management of each segment of the National Trails System shall be designed to harmonize with and complement any established multiple-use plans for that specific area in order to ensure continued maximum benefits from the land ... (Sec. 7(a))".

The proposal of a buffer zone around the PCT would create disharmony with the long established OSV trail system.

There is another serious consideration in regards to the proposed buffer zone for the PCT. At the time the 1982 PCT Comprehensive Plan was under analysis, the FS sought input from a wide variety of stakeholders. From page 15 of the PCT Comprehensive Plan;

"The Forest Service carried out the environmental analysis under the guidelines contained in Chapter 1950 (Forest Service NEPA Process) of the Forest Service Manual. This effort was coordinated with the Bureau of Land Management and the National Park Service. The States of California, Oregon, and Washington and the Pacific Crest National Scenic Trail Advisory Council were also consulted. Public (users, landowners, special interest groups, etc.) input was solicited on issues, decision criteria, and alternatives."

A proposal is being made in the DEIS to substantively change management strategy for the PCT but the FS has chosen to arbitrarily exclude important stakeholders from providing input on this serious alteration of the PCT Comprehensive Plan. Since the PCT Comprehensive Plan has been in effect for roughly 36 years, any proposed alteration in management strategies must involve an opportunity for the public to provide meaningful comment, consistent with NEPA regulation. But a Subpart C analysis for one forest is not the appropriate vehicle for instituting what amounts to a significant management change.

The DEIS does propose designated crossings for snowmobiles over the PCT. Crossings for snowmobiles may be designated according to the PCT Comprehensive Plan, but the Pacific Crest Trail Comprehensive Plan states on Page 21:

"Winter use (cross-country skiing and snowshoeing) should be accommodated where practical and feasible. Each agency should follow its own procedures for marking and

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signing the trail for winter use purposes. As a guideline, all trail markers should be at eye level (approximately 40" above average maximum snow depth). Sanitation facilities and snow removal for parking may be necessary. Any improvements, or alterations of the vegetation, should not detract from the quality of the recreation opportunities for other trail activities such as hiking and horseback riding.

Snowmobiling along the trail is prohibited by the National Trails System Act, P.L. 90-543, Section 7(c), Winter sports plans for areas through which the trail passes should consider this prohibition in determining areas appropriate for snowmobile use.

Winter sports brochures should indicate designated snowmobile crossings on the Pacific Crest Trail [only] where it is signed and marked for winter use if cross-country skiing and/or snowshoeing is planned for the trail, any motorized use of adjacent land should be zoned to mitigate the noise of conflict."

Since the forest does not propose to manage the PCT for winter use and erect clear signage in compliance with the Comprehensive Plan in remote areas such as the Gold Lakes area to Laporte, there is no need for designated snowmobile crossings. This proposal clearly violates the existing PCT Comprehensive Plan. In discussions with PNF staff, the provision of winter management and signage was appropriately assessed as impractical. Likewise, so are designating crossings and resulting no-crossing zones.

Common sense would also dictate that it is impossible to designate specific crossings due to the changeable nature of snow. The crossings in the DEIS are not based on actual patterns of use, and would very likely lead to hazardous situations for OSV enthusiasts. In this case, public safety concerns must trump statements in the PCT that are not based on actual situations. Because of serious public safety issues and potential loss of life and limb due to designated crossings, the forest cannot designate specific PCT crossings.

Remedy: the FS must abandon any attempt to change management strategies for the PCT in this document. It is outside the scope of the analysis, violates NEPA by preventing all stakeholders from submitting substantive comments and violates the existing PCT Comprehensive Plan.

Specific Area Recommendations

Inventoried Roadless and Recommended Wilderness: There is no basis to restrict OSV travel in these areas. Restrictions in these areas represent 'Wilderness Creep', the increasingly common push to manage non-congressionally designated Wilderness areas as designated Wilderness. In many instances this is done at the urging of environmental groups alleging

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that they have inside knowledge that a specific area may become designated Wilderness in the future. However, no such crystal ball exists in regards to any land use planning efforts, and the agency does not need to kowtow to these requests. We urge the Plumas and Region 5 to avoid joining what has become an ideological but completely avoidable battle over imposition of Wilderness management in non wilderness areas.

Lake Davis: Regarding Bald Eagle protection zones. The Bald Eagle is now a species of least concern. There is no rational basis for any restrictions on historic OSV access. Forest Supervisor Lovato stated in a public meeting that had must implement closures because of criteria regarding the Bald Eagle in the 1988 LRMP. However, since Supervisor Lovato ignored the data regarding continued OSV access in RX-8 management areas, the forest cannot pick and choose which elements of the LRMP it will adhere to and which it will conveniently ignore.

Jamison Creek: Proposed closures are supposedly based on possible Wild and Scenic River suitability. OSV use and WSRA suitability are unrelated. In the 1988 LRMP, RX-8 management schemes actually recognize the legitimacy of continuing OSV access in this area.

McRae Meadow: Closures are based on concerns about aquatic species. There is no rational basis for these closures, or any connection to adverse effects based on OSV travel on a blanket of snow over wintering species or habitat.

Mount Fillmore: There is existing and continuing motorized access along routes 22N43 and 10M06, and OSV travel is even more defensible since the resources of concern are sensitive plant species, which will be blanketed by snow during any OSV access. There is no rational basis for this closure.

Bucks Lake: The Bucks Lake Wilderness comprises 24,000 acres and offers non motorized recreation opportunities. There is no rational basis to eliminate motorized access from nearby areas. This proposed closure would also violate Forest Plan prescriptions that this be "roaded modified."

Thompson Peak: This area is not an exclusive backcountry skiing area as the DEIS suggests, as the entire eastern escarpment provides similar opportunities. The Janesville Grade/County Road 208 is an established right of way and should be designated for OSV travel. The skiing and OSV riding areas are distinct and can be separately recognized/separated without adverse effects to any users.

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Dixie Mountain: Closures here are based on concerns about Bailey's Ivesia, which generally grows on volcanic cliff faces incapable of being traveled by OSV. Where plants grow in soils, they are amply protected by snow depth which supports safe snowmobile operations per manufacturer recommendations.

Grizzly Ridge: This is a potential roadless area and is designated semi primitive RX-8 in the Forest Plan. None of this is inconsistent with continuing OSV access. The RX-8 designation specifically allows for continuing OSV travel. Recommendation – Modify the areas designated for OSV use to include the above described prescriptions.

In Conclusion, CORVA concludes this DEIS is invalid and violates the Purpose and Need.

Along with the errors, misinformation stated above, this DEIS contains:

-) Proposed limitations to OSV recreation in violation to the existing LRMP
-) Biased and erroneous opinions masquerading as fact regarding OSV recreation based on ideology.
-) Hearsay regarding user conflict, unsupported by documentation
-) Incorrect registration numbers from California State Parks instead of valid information from the Department of Motor Vehicles used for modeling of alternatives.
-) Studies by Winter Wildlands, that are not peer-reviewed but consist of erroneous and negative conclusions based on ideology, from an organization that condones smear campaign tactics against OSV recreation.

It does not contain:

-) A forest plan amendment that would allow changes to existing OSV access.
-) An analysis that seriously considers negative effects to motorized enthusiasts from the proposed loss of area open to OSV travel.
-) An analysis how rural community economic viability would likely be affected by the proposed loss of opportunity in the proposed action.
-) An analysis indicating how the proposed loss of opportunity would diminish OSV recreational experience.
-) A true No Action Alternative

Remedy: The forest must issue a Supplemental Draft Environmental Impact Statement because this DEIS violates the existing LRMP. The new document must comply with the existing LRMP or propose a forest plan amendment. The new document must also disregard and remove analysis and consideration of non-motorized use because it is clearly outside the

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scope of this NEPA analysis. The inclusion of this information shortchanges the OSV community and violates Subpart C Final Rule guidelines. All reference to non-motorized opportunities must be eliminated from the DEIS, otherwise the document fails in all capacities.

Sincerely,

A handwritten signature in black ink, which appears to read "Amy Granat".

Amy Granat
Managing Director
CORVA
California Off-Road Vehicle Association

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