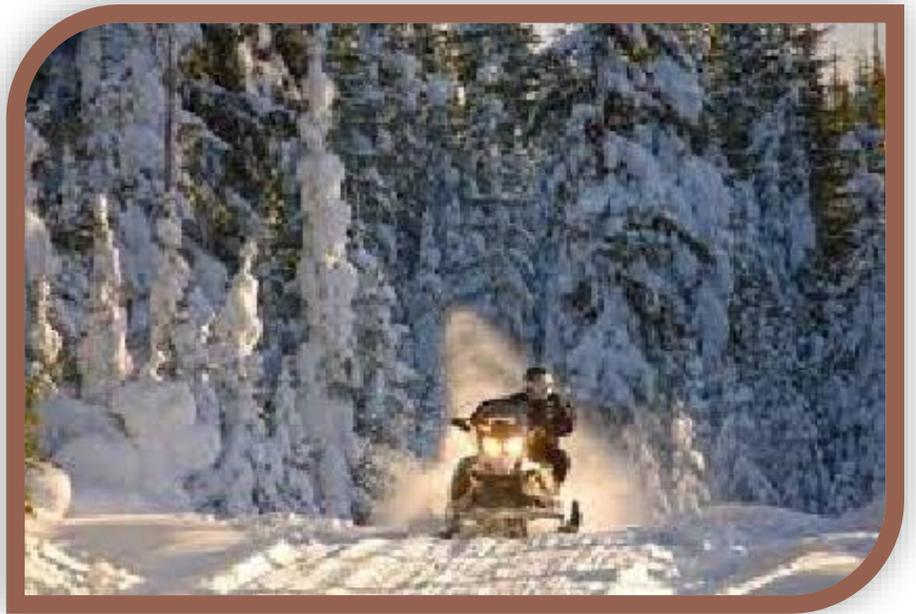


Citizens Alternative for Plumas N.F. Subpart C, Over-the-Snow Use  
USDA Forest Service, Travel Management Rule



**Coalition of Organizations**

*Sierra Access Coalition*  
*Bucks Lake Snowdrifters*  
*Sierra Buttes Snowbusters*  
*Butte Meadows Hillsliders*  
*Recreation Outdoors Coalition*  
*Friends of Independence Lake Inc.*  
*California Off-Road Vehicle Assoc.*  
*DuPont Power Tool*  
*Precision Building*  
*Stewards of the Greys*

## Citizens Alternative for Subpart C

The Forest Service has been mandated by court settlement to complete an analysis for over-the-snow travel by snowmobile pursuant to Subpart C of the Travel Management Rule issued in November of 2005. In the nine years since the Travel Management Rule has been adopted, all forests in California's Region 5 have completed analysis for motorized travel with pursuant to Subpart B of Travel Management. Our goal in submitting this Citizens Alternative is to present the Forest Service with an alternative based on information and documentation from rural residents, forest visitors and rural communities to enhance existing opportunities for both motorized and non-motorized recreation enthusiasts while maintaining the economic stimulus that winter recreation provides to communities and small businesses throughout the Sierra Nevada mountain range.



The Citizens Alternative strives to reach a crucial balance to benefit all types of winter recreation enthusiasts by highlighting opportunities and areas available to each specialized form of recreation to enjoy. We believe that the forests in the Sierra Nevada provide both an opportunity for enhanced motorized recreation along with the ability to find solitude and quiet in areas such as Wilderness, Wild and Scenic River, and other non-motorized areas that proliferate throughout the geographic area currently undergoing analysis for Subpart C of Travel Management.

At the same time, we believe that some ecological criteria should remain with the Forest Service's purview to analyze and determine that appropriateness is consistent with federal regulation and statute.

## Criteria for the Citizens Alternative

### 1. Pacific Crest Trail Crossings

It is essential that several crossings, only for motorized winter use, must be designated along the Pacific Crest Trail (PCT), particularly in the Lakes Basin area. Without these crossings, OSV use is severely restricted and serious safety issues result.

The Coalition of Organizations has developed proposed PCT crossing areas on the Plumas N.F., which also must coincide with crossings proposed on the Tahoe N.F. All crossings would be restricted to 90 degrees of the PCT, riding parallel to the PCT should be discouraged, and no riding would allowed on the PCT itself. 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. To provide safe passage over snow cornices, the crossing areas must wide enough to allow flexibility with the changing snow conditions.



### 2. Minimum Snow Depth

This is one issue that is of critical interest to motorized winter recreation enthusiasts given the changing climate scenario currently being experienced in the Sierra Nevada. There is a self-limiting factor with the capability of modern snowmobiles that alleviates the agency from the necessity of fixing a minimum snow depth for use of motorized vehicles for over-the-snow travel. Depending on the snow condition itself, as an example, hard pack conditions of 3 inches of "Sierra Concrete" 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 paved or native surface roads. Similarly, open areas should be treated differently than groomed trails, which will require greater snow depth for safe travel over natural obstacles such as boulders and tree stumps. We propose no minimum snow depth on all roads, because even if the sled touches the underlying road and there is any disturbance to the road, it will be similar to rubber tires of a vehicle or the skis of a cross country skier which are both allowed. A snowmobiler will make every attempt to avoid running on soil, gravel or pavement because damage to their machine is very costly.

The depth of snow needed for grooming is often determined by those responsible for the grooming itself. In this case grooming in the Sierra Nevada forests is funded by the OHV Division

of California State Parks. Oftentimes hard and fast rules that do not take into account actual conditions on the ground lead to misunderstanding within communities, and to alleviate that possibility we strongly encourage the Forest Service to form citizen monitoring groups composed of motorized and non-motorized enthusiasts that could assist the agencies and report on existing conditions of popular use areas so actual on-the-ground conditions dictate use rather than predetermined criteria.

In order to perform a proper Environmental Impact Statement with an adequate range of alternatives, it is essential that at least one alternative will analyze a “no snow depth restriction” supported by the best available science.

Sierra Access Coalition submitted requests to all five forests under the Freedom of Information Act, requesting the science that was used to determine the 12” snow depth rule. To date, none of the forests have provided any credible science to support the proposed 12” snow depth.

The Citizens Alternative requires that the EIS provides a detailed Snow Depth and Law Enforcement Plan. As a minimum, the plan needs to show specific areas where snow will be measured, how it will be measured, who will measure it, how the depth will be analyzed, and how it will be enforced. What at first seems to be a simple measuring process is actually very complex, requiring many factors including measuring snow compaction and density, temperatures, micro-climates, aspect, time of day, and the measurement location. The public must have an opportunity to comment on this all important plan.

### 3. Dates for Snowmobile Travel

Much has been written about the changing climate conditions currently being experienced in the Sierra Nevada Mountains. Models have been created that predict widely different scenarios for the snowpack over the next 50 years. That variability is illustrated in General Technical Report PSW-GTW-237, authored by Malcolm North et al; Pacific Southwest Research Station. Quoting the report; *“Over the last 50 years, spring snowpack has decreased by 70 to 120 percent across most of the northern Sierra Nevada, but snowpack is up in much of the southern Sierra Nevada, owing to the combination of higher precipitation and the terrain’s higher elevation”*.<sup>1</sup>

With the variability suggested in snowpack amounts for different areas of the Sierra Nevada Mountains, common sense dictates a more hands-on management technique is warranted rather than the outmoded model of dates for allowable uses. It is a scientific reality that it may become difficult to predict the weather in coming years, which may require changes to protect natural resources but allow the maximum amount of recreation opportunity.

To achieve that goal:

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<sup>1</sup> [http://www.fs.fed.us/psw/publications/documents/psw\\_gtr237/](http://www.fs.fed.us/psw/publications/documents/psw_gtr237/)

- A. Visible inspection of conditions at previously determined sample areas will be required.
- B. Higher elevation areas must be sampled along with lower elevation areas, because of the great variability possible in snowpack.
- C. Any closures due to snow depth must be based on actual snow conditions gathered in cooperation with Forest Service personnel.
- D. Criteria have to be pre-established to allow for unbiased reporting of conditions.

#### 4. Use Conflict

At times reports of conflict between over-the-snow communities have been reported, largely on an anecdotal level. We suggest that conflict is largely defined by the person, and one person with a particular intolerance for either motorized or non-motorized recreation alike can exaggerate claims trying to create disharmony within those communities. This can also serve to bring the Forest Service in as moderator into an argument that is emotionally, rather than factually, based. The Notice of Intent implies a level of conflict that simply does not exist. At the NOI public meetings, Plumas Co. Sheriff Greg Hagwood stated restrictions in the Lakes Basin and other areas create problems and conflicts where none exist. He stated that an unenforceable plan only results in anger and mistrust for the Forest Service. As a respected law enforcement professional we support his position.

We suggest a number of methods to resolve this issue. The Coalition of Organizations strongly recommends that the Forest Service issue maps illustrating areas that are open exclusively for non-motorized over-the-snow travel. This would be in addition to the usual motorized over-the-snow travel recreation map. This would encourage broader use of the forest by non-motorized over-the-snow enthusiasts into quiet areas including:

- Wilderness Areas
- RARE II Areas
- Non-motorized Areas
- Wild and Scenic River Areas
- Research Natural Areas
- Backcountry Non-Motorized designated areas
- State and National Parks

Motorized activities in these areas are currently prohibited. Maps displaying these areas would help non-motorized users find the quiet recreation experience and solitude they seek.

Producing maps illustrating opportunities for non-motorized over-the-snow travel would also serve to:

- A. Reduce concentrations of individuals.
- B. Highlight opportunities specific to non-motorized activities.
- C. Minimize user conflict.
- D. Enhance the non-motorized experience.

Many forests already produce maps that highlight different recreation opportunities offered in their forest; producing a map highlighting non-motorized over-the-snow activities would work in the same capacity to encourage the diversity of uses consistent with the Multiple Use Sustained Yield Act of 1960. We encourage the Forest Service to engage all local forest users in educational activities to encourage acceptance of diversity of recreation opportunities. Local citizen groups can also assist by erecting signboards advising enthusiasts the type(s) of use they are likely to encounter in an area. Similarly, trailheads and staging areas should be repaired or enhanced where needed for both motorized and non-motorized enthusiasts to ensure a parity of conditions for all recreation enthusiasts. Should conflict still arise, which is highly unlikely, trails groomed and paid for through Off-Highway Vehicle Trust Funds could be designated solely for motorized use.

## 5. Wildlife Corridors

The best available science must be used to determine the distance from a groomed trail to protect wildlife, consistent with federal and state regulations. Many times the Forest Service chooses to double or triple the amount of setback required from groomed trails, or even close entire areas due to nesting bald eagles. However we strongly encourage the Forest Service to comply with existing Fish and Wildlife recommendations (both state and federal). Relying on current accepted criteria will ensure the preservation of the species in questions, while discouraging arbitrary and hypothetical scenarios. We request the Forest Service adopt the US Fish and Wildlife National Bald Eagle Management Guidelines requiring 330' trail distance from nest trees.<sup>2</sup>

## 6. Socioeconomic Considerations

The geographic areas around the five forests currently pursuing analyses under Subpart C of Travel Management represent some of the least-advantaged areas in the state. Each of the areas surrounding these forests are still exhibiting recovery from the economic downturn of 2008, along with the cessation and elimination of traditional sustaining economic activities such as logging. Any changes for motorized winter recreation access will cause further extreme hardship in these areas.

It is essential that groomed trails connect to the Chalet View Lodge, Lake Davis Motel, and J&J Grizzly Store and Camping Resort in the eastern portion of the Plumas NF. At least one snowmobile guide business operates on the trails in the Lake Davis area. It is critical to locate groomed trails to enhance all of these businesses. A parking area and groomer shed location at Lake Davis must be analyzed during this NEPA process. Businesses in the La Porte area also rely heavily on winter recreation including La Porte General Store, La Porte Sports Center, La Porte Service and Repair, Reilly's Saloon and Café, Rabbit Creek Deli, Gold Country Lodge, Union Hotel,

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<sup>2</sup> <http://www.fws.gov/northeast/ecologicalservices/eagleguidelines/recreation.html>

Howard Services, and La Porte Cabins. Businesses at Bucks Lake including Lakeshore Resort and Bucks Lake Lodge, must be included as they rely heavily on winter revenue. All businesses in Plumas County including the larger communities must be considered during this process.

We also request the analysis to consider 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. The Forest Service has been aware of this unsafe situation for years, and this is an opportunity to analyze for potential expansion.

Snow depth restrictions have a direct effect on businesses and the economy. As an example, 3' of hard packed snow and ice will provide protection to underlying resources. But since it's less than the required 12", trails would be shut down and businesses would suffer even though there may be adequate snow depth in higher elevation and adjacent areas. Snow depth restrictions have the potential to affect tourism, and people may cancel their plans to travel to the Plumas N.F. in fear of the trails being shut down unnecessarily.

In the NEPA documentation to follow, the Forest Service must reference growth and circumstances of existing motorized over-the-snow travel with up-to-date conditions in order to accurately predict the hardship future alteration to the plan may cause. Also, economic analyses should consider how previous changes in snowmobile access have affected local communities, specifically noting if those changes came at the requirement of new endangered/threatened species designations or response to lawsuit.

To assure a successful and meaningful result, the economic analysis must be included a specific item in the Purpose and Need for the project. Coordination with local governments, tribes, Chambers of Commerce and other organizations are critical. The International Snowmobile Manufacturers Association published economic information that must be included in the analysis. This information was submitted to the Enterprise Team at the Quincy meeting in 2014.

As a minimum, the economic analysis must address how restriction and/or expansion of the trail system and access area may:

- A. Increase/decrease the Transient Occupancy Tax that benefits rural counties and towns.
- B. Potential increase/decrease of gross sales including gas, repairs and accessory purchases related to snowmobiles
- C. Increase/decrease of sales tax income to rural counties and cities.
- D. Potential loss/gain of direct and indirect employment for activities dependent on motorized access and/or snowmobiles.
- E. Increase/decrease of number of businesses dependent on winter sales associated with snowmobile enthusiasts or activity.
- F. Assess the long-term change of winter expansion/restrictions on real estate values, resulting in lower tax income for counties.
- G. Determine the potential positive/negative economic effect on activities dependent on motorized access including ice fishing.

The Forest Service is encouraged to develop strong partnerships with local rural communities to assist with maintenance of trailheads and grooming programs. Collaboration and coordination

with local governments and tribal representatives is essential for developing the best possible winter recreation plan. Working together with local communities is beneficial to all concerned and will sustain motorized over-the-snow recreation for many years to come.

## 7. Right Sizing the Trail/Groomed System

Snowmobile open areas, groomed trails and staging areas must be proportional with the increase in usage that has been seen in recent years. The International Snowmobile Manufacturers Association reports that there is an increase in snowmobile registrations in North America of 2 million units in 2013. Plumas County has the second highest snowmobile registration in California. The trend of such an increase in registration indicates that right-sizing the trail system and open areas to accommodate the increasing use is necessary for safer riding conditions and to enhance the recreational experience.

Judiciously expanding the trail system and open areas would:

- A. Relieve concentration of use on the trails and in parking areas.
- B. Minimize user conflict.
- C. Increase rider satisfaction and quality of experience.
- D. Lessen noise impacts to surrounding environments.
- E. Diversify available opportunities to allow for beginning riders.
- F. Provide a safer experience.

The multiple use mandate given by Congress to the Forest Service dictates that the quality of the user experience is important to the fulfillment of the agency's mission. Therefore right-sizing the trail system and open areas available for motorized use is simply the proper course for the Forest Service to follow with Subpart C of Travel Management.

## 8. Specific Items for the Citizens Alternative

We request the following specific items to be included in the Citizens Alternative:

- a) No motorized restrictions in the Jamison/Florentine/Wades Lake area, allowing this historically used area to continue to provide a unique OSV experience, and strengthen the local winter economy.
- b) No snow depth restrictions on existing roads, and a 12" restriction only in cross country areas. There must be a clear definition of what comprises resource damage and visual damage, and that snowmobile impacts to a road are no different than wheeled vehicles.
- c) A detailed law enforcement plan must be developed both to educate OSV riders and to prevent resource damage from occurring.

- d) PCT crossings must be designated as a linear feature, rather than a small area, to allow flexibility in snow conditions, such as cornices, that change with each storm. It is essential that flexibility in crossing locations provide for rider safety.
- e) Additional groomed trails at Lake Davis, in hopes of future funding. (See attached Citizens Alternative map and GIS data).
- f) Analyze for a groomer shed location at Lake Davis near the store, in anticipation of possible future funding.
- g) Analyze for expansion of the Lakes Basin and La Porte Staging areas, in anticipation of applying for future funding, to minimize user conflict and provide for public safety.
- h) Add the groomed trail on the Plumas NF near Red Rock, which was included in the Lassen NF NOI.
- i) Extend the Mill Creek OSV Trail into Section 16 to provide a safe turnaround area for the groomer.
- j) Analyze extending the Bucks Lake groomed trail system into the Fourth Water and Tamarack areas, in case of future funding for grooming or possible loss of trails through this NEPA process. (See attached Citizens Alternative map and GIS data).
- k) Show all historically mapped trails on the final OSV map to help people find their way, and to show trails that can be used when passing bald eagle nest sites, including the Antelope Lake area.
- l) Analyze for elimination of OSV restrictions on the Bucks Creek Loop Trail which, according to PNF employees, is rarely used by non-motorized users because of the overgrown brush and tree drip line. If this trail cannot be eliminated, allow OSVs to cross the trail.
- m) The location of the Gravel Range OSV Trail on the map is inaccurate. Please correct the location.

Please provide feedback on each of these items.

## In Summation

We thank the Forest Service for the consideration of the criteria contained in the Citizens Alternative. The coalition of communities and organizations represented in this document believe enhancement of both motorized and non-motorized over-the-snow opportunities should exist in our national forests and have strived to create circumstances in this document to provide for all communities. Sometimes complaints are aired about motorized recreation of all

kind, but in particular the complaints regarding snowmobile recreation are often very emotional, rather than factual, in nature.

Modern snowmobiles are quiet and efficient as manufacturers have gone to great lengths to improve sound, safety and rider comfort. Engines are all low-emission using similarly low-emission biodegradable synthetic oils. Snowmobiles meet all current federal restrictions for noise and emission, so further consideration of those issues by the Forest Service is not warranted. These machines are used by all Search and Rescue organizations in mountain communities because it is recognized that they provide superior mobility to reach those who may be stranded and/or wounded in winter conditions. The Forest Service must put aside those complaints based on emotional pleas and ignore the citations of questionable science to fulfill its duty to the everyday citizen who merely wants to get out with their families and enjoy winter recreation. We firmly believe that there is room for all forms of recreation in the Sierra Nevada forests. By supplying maps of areas that are currently open solely to non-motorized recreation, enthusiasts of those sports seeking a quiet environment will have an enhanced recreation experience.

Similarly, we would ask that citizen monitors from all communities be part of a solution-oriented mandate to dispassionately assess conditions which will then be supplied to Forest Service experts for analysis to determine on-the ground conditions. Partnerships with local counties and towns will also assist the Forest Service with manpower and funding issues that may be related analysis of on-the-ground conditions.

We look forward to working with the Forest Service into the future and encourage the agency to adopt the criteria in our Citizens Alternative.

The Coalition of Organizations can be contacted through Sierra Access Coalition, (530) 283-2028.