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Plumas National Forest
Acting Forest Supervisor Barbara Drake
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Re: Plumas N.F. Over Snow Vehicles Use Designation DEIS Comments

We appreciate the opportunity to submit comments to the Draft EIS of the Plumas National Forest Over Snow Vehicle Use Designation dated October 2018. Sierra Access Coalition (SAC) is a non-profit organization with over 1500 members who work to preserve access to our public lands. On behalf of our members, we submit the following comments. This document attempts to identify problems and potential solutions in an effort to work collaboratively with the Forest Service to identify reasonable modifications to the Forest's Proposed Alternative 2.

1. Lakes Basin

SAC adamantly opposes the proposed non-motorized area in sections 3 and 34 at the headwaters of the Jamison drainage. A vocal minority of backcountry skiers and wilderness proponents have identified this as an area they want for their exclusive use. However, this is an extremely high use area that has been used by many snowmobilers for decades and this historically use should continue.

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

- There are two large roadless 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 buffer 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 Proposed Action Alt 2 closure in the upper 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 the map we submitted with our comments on the NOI.) This is a motorized project, but the majority of the

proposed action contains significant elements of a nonmotorized project. This makes us wonder what the true objective of this project is, since very little of it is actually consistent with the Purpose and Need of enhancing OSV use. The closure of the Upper Jamison drainage is in direct violation of the Purpose and Need, which is to effectively manage “high quality, public OSV access”. Lakes Basin is by far the most popular OSV area on the PNF. Access to other popular OSV destinations adjacent to Lakes Basin and to La Porte is essential to OSV users. A PNF official said the Jamison drainage is eligible for Wild and Scenic River status. However, the agreement with two appellants of the 1988 LRMP states only the area within ¼ mile of the drainage would be managed as Wild and Scenic. So the entire area is not required to be closed, and should remain open due to its importance to OSV users.

Lakes Basin Solutions:

1. As a compromise, designate the upper Jamison drainage open for OSV use, and manage the area between Rock Lake and Plumas Eureka State Park as nonmotorized for quiet recreation. There is a natural cliff barrier just north of Rock Lake, which is an easily recognizable boundary. This line needs to continue north to Mount Washington and continue to the park boundary and follow it to County Road 507 east to FS23N08. This compromise would allow historical OSV access between La Porte and Lakes Basin, while expanding the nonmotorized use of the state park.
2. Do not approve the proposed PCT buffer. The Tahoe and Lassen NF did not approve the PCT buffer on their forest. Since the PCT runs along the boundary of the Tahoe and Plumas NFs for several miles, if the buffer is approved on the PNF, there would be a buffer on one side of the PCT but not on the other side. There must be consistency between forests.

2. LRMP and Prescriptions

The Plumas LRMP prescriptions dictate management of the Plumas NF. The prescriptions cannot be changed without a LRMP Amendment.

- Rx-8 – This prescription throughout the PNF LRMP applies to 79,500 acres in the following areas: Bald Rock, Beartrap, Chips Creek, Dixon Creek, Grizzly Peak, Keddie Ridge, Lakes Basin, Middle Fork, and Thompson Peak. The Rx-8 prescription states, “Allow no motorized travel *except over-the-snow* and management access.” To be consistent with the LRMP, all of these areas must remain open to OSV use.
- Rx-10 – In Alt 2, these areas are categorically closed around Butt Lake and other areas. This Rx has no restrictions to vehicles so the areas must remain open to OSV use.
- Rx-5 - Some recreation areas are Rx-5 which only restricts *wheeled* vehicles, so OSV cannot be restricted in those areas.
- Rx-14 - Hauns Meadow Rd is county road, so the Rx-14 portion near Lake Almanor should remain open since access is allowed by County Road and Rx-14 does not prohibit OSV use.
- Forest Service system roads with legal right-of-way, such as Fruit Growers Boulevard 28N03, should be open to OSV. Closure of these legal roads results in a barrier to thousands of acres of popular riding areas to the north.

- Brady's Camp and the surrounding area should remain open to OSV because snow covers and protects the plants that are botany concerns. This exclusion is a barrier to the scenic Devils Post Pile, which is a popular destination and play area. The PNF has used grant funding from the Off-Highway Motor Vehicle Recreation Division at Brady's Camp, so it must remain open. The DEIS says the draw above Brady's camp is restricted for deer habitat. But it's common knowledge that when there is deep snow, the deer move to other areas in search of food. Since OSV designation is effective only when there is adequate snow, which is the time the deer are gone, there is no conflict between deer and OSV.
- The Recreation Opportunity Spectrum appears to be in conflict with the Rx prescriptions, according to the GIS data for Alt 2. The LRMP takes precedence over the ROS data, which appears to have been used in the decision making process, so the ROS is irrelevant in this situation. The ROS must be eliminated.
- OSV use on frozen lakes is not prohibited in the DEIS document but appears to be excluded on the DEIS maps. This inconsistency must be corrected.

Deviation from the LRMP without an amendment would be a fatal flaw in the FEIS.

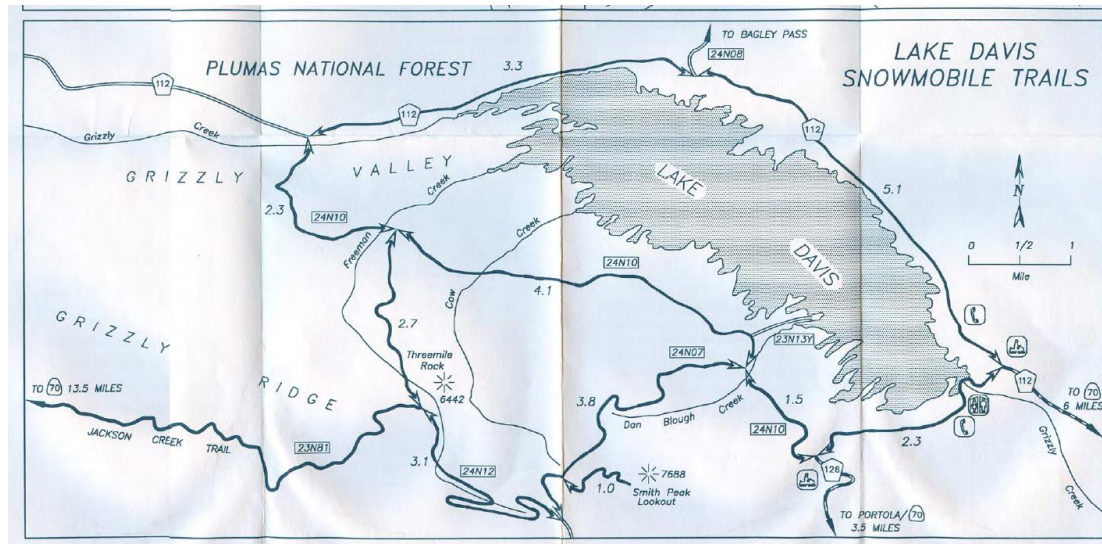
Rx and ROS Solutions:

1. All Rx-8, Rx-5, Rx-10, and Rx-14 areas must remain open to OSV use, as stated in the LRMP.
2. The ROS data set should not be used when there is a conflict between Rx and ROS, and those areas must be reanalyzed. Errors are due to old technology in mapping.
3. All FS system roads with a legal right-of-way must allow OSV use.
4. The Brady Camp area must remain open to OSV.
5. OSV use on frozen lakes must be allowed to continue.

3. Lake Davis

The OSV Designation Project is a great opportunity to improve the economics of the Lake Davis area and the eastside of Plumas County, but the Forest Service has fallen short and has not shown consideration for local business. The Lake Davis area has several businesses that 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 planned. 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.

In 2012 the PNF applied for and received an OSV Grant from the state to study the feasibility of OSV use in the Lake Davis area. The main stated objective to create an OSV area that would take pressure off the high use Lakes Basin area. The DEIS does not reflect this objective. The areas around the lake are closed to OSV and there is no analysis for a staging area or grooming shed, which were requested by the public at all the workshops and public meetings regarding the Lake Davis winter plan. There was a designated OSV area map for Lake Davis for over a decade, but the PNF denied ever seeing the map. The Beckwourth District Ranger said it would be reprinted and distributed, but that never happened. All of the trails shown on this map below need to be designated as OSV trails, especially the Bagley Pass Road which should be shown as "potentially" groomed.



The public asked for these designations to be carried forward in the new OSV plan, but that request has been ignored.

Bald Eagles are an issue at Lake Davis, as well as the Antelope Lake, and Frazier Falls areas. The Frazier Falls nest is displayed on the map as being an OSV restricted area but it is not shown on the LRMP map as an Rx-11. The FEIS must explain how that contradiction was resolved. There is no analysis of nonmotorized use for this nest or other nests at Lake Davis and Antelope Lake. The reason for the lack of analysis for nonmotorized use must be disclosed in the FEIS.

Lake Davis Solutions:

1. Designate cross country areas for OSV around the lake, except for within 600' of protected eagle nests.
2. Reanalyze the Lake Davis area using public comments and the Plumas County proposal that were submitted during the OSV Feasibility Study.
3. Make a commitment to apply for State grant funding in 2020 for a parking lot, staging area, and groomer shed in the Lake Davis area.

4. Bucks Lake

Regarding the proposed OSV closure adjacent to the Bucks Lake Wilderness, there are roadless 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. We provided a map of this area in our comment letter to the NOI. Many local people use this area for snowmobiling, so this closure would have a negative effect on the businesses at Bucks Lake and surrounding communities which has not been properly evaluated in the economic analysis section of the DEIS.

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). The DEIS states it is a violation to operate or possess an OSV within the restricted areas. There are many homes within the OSV restricted area around Bucks Lake, and homeowners need to know if they are allowed to possess a snowmobile at their residences that lie within the restricted areas.

SAC shares the common goal of preventing OSV intrusion in the wilderness. However, the proposed trail in section 16 is poorly located which is actually within the wilderness for a short distance and creates risk of intrusion into the wilderness.

Bucks Lake Solutions:

1. Grooming in section 16 should be relocated to the west, to the first suitable turn around/landing, which would direct OSV away from the wilderness area (see map submitted in SAC's comment letter to the NOI).
2. Coordinate with Plumas County regarding landowners' access issues.

5. Pacific Crest Trail Buffer and Crossings

SAC opposes the PCT buffer. The Lassen, Tahoe, Stanislaus and Eldorado have not proposed a PCT buffer on their forests. The Plumas must not approve any PCT buffer and maintain consistency between forests that is easily understood by all users.

Katherine Carpenter stated the PNF doesn't manage the PCT for winter use. PCT use on the PNF is virtually nonexistent during winter months of OSV use. The PCTA's website discourages winter use citing avalanche, cold temperatures, and risk of serious injury or death to winter users as well as their rescuers. It is disingenuous for the FS to propose a buffer for a trail that is rarely, if ever, used by skiers or snowshoers. It is in violation of the Purpose and Need which is to promote "the safety of all users".

The photos below show how dangerous it can be on ridgetops where cornices and avalanche areas form. These areas are not predictable, so crossing points cannot simply be drawn on a map. A buffer on each side of the PCT would create a substantial safety hazard for OSV seeking to cross the trail at the designated points. Unsafe crossings pose a significant problem for Search and Rescue personnel, who would risk their own safety to rescue OSVs who attempted to adhere to the unsafe designated crossings.

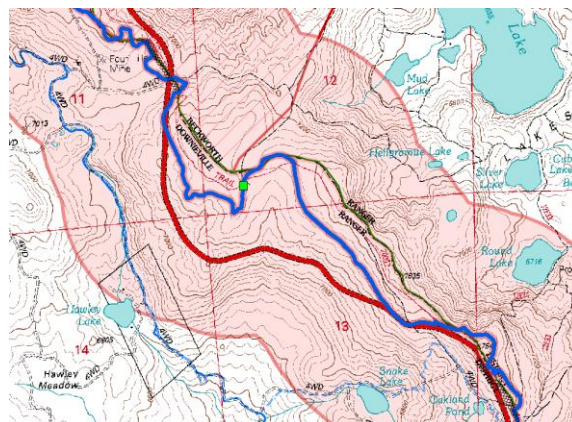




Since the PCT is not managed and signed for winter use, during deep snow conditions it is impossible to locate the PCT trail buried under snow that could range from a few feet to possibly 20+ feet deep. In those conditions the actual trail is not visible or locatable. For example, see the discrepancies in data displayed in the map below. A user's GPS could show conflicting locations for the trail, making it impossible to find an approved crossing. 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.

In the Lakes Basin area, the PCT runs along the border of the Tahoe and Plumas NFs. The Tahoe NF did not approve a buffer along the PCT on their forest. However, the Plumas NF is proposing a buffer on their side of the PCT. It is confusing and disingenuous, that the two forests have two different land management policies.

In our NOI comment letter, SAC proposed the PCT crossings that are required for public safety. Public safety is a priority in the Purpose and Need for this project. The crossings shown in the DEIS provide some areas that are needed, but additional crossing areas are required for safety and must be approved. When we field verified the proposed crossings, we found they are not all in the needed locations and some were not even accessible. Once again, we need the crossings that SAC proposed in our NOI letter and have discussed with the FS in meetings. The FS needs to field verify their crossing data, and not make any adjustments in the office.



PCT Solutions:

1. Do not approve the proposed buffer of the PCT. This is not consistent with the PCT Management Plan, and it would be in violation of the OSV project's stated Purpose and Need. Considering the rare use of the PCT in winter, this would not be an impact to nonmotorized users.
2. OSV use is generally in an easterly/westerly direction. OSV do not ride on the PCT itself, but inherently only seek a 90 degree crossing to continue riding to their destination. For safety, OSV need the flexibility to cross where current snow conditions dictate which change with each storm.
3. Public scoping was not conducted for a PCT buffer, so it would be a violation of NEPA to approve a buffer at this time.

6. Snow Depth

The Purpose and Need in the NOI and DEIS 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*." To a snowmobiler, the term "adequate snow" simply means deep enough snow to safely ride their machine. Therefore the rider should be the judge of adequate snow, the same as an OHV is allowed to determine when there is too much snow for their wheeled vehicles. Snowmobilers are being held to a higher standard than OHVs.

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. This pre-dated the Colorado snow depth research paper. We don't know if that attorney possesses any science regarding adequate snow depth, but after several FOIA requests to the five forests involved in Subpart C analysis asking for information regarding how they arrived at 12 inches, the Forest Service was unable to produce scientific data to support the statement that adequate snow depth is 12 inches, except for a paper that discusses snow conditions in Colorado which are not applicable to Sierra snow and site specific conditions. The Colorado research paper doesn't address local snow issues such as "Sierra Cement". Colorado uses different types of snowmobiles because they have a different type of snow (colder, denser powder with different properties, holding capacity, time of day, location, temperature, snow structure, etc.) It does not analyze the current weight of the snow load on the surface. In their research, they never measured just a 12" depth, but analyzed for much deeper snow. So that research is not applicable to the Plumas OSV proposal and must be eliminated from the FEIS.

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 and cause damage to the machine or to the resources. A snow depth restriction will not prevent resource damage in all situations. FS LEOs cannot legally write citations for OSV use when there is less than 12" of snow. They can only write citations for resource damage. So a minimum snow depth restriction is irrelevant and useless. Yet the Forest Service still insists on using a 12" minimum depth, which only serves to fuel heated debates and mistrust of the agency.

SAC is adamant that there is no minimum snow depth restriction for all Forest Service system roads, because even if the sled touches the underlying road surface, any disturbance to the road would 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 or nonmotorized users. At what point is a 4x4 vehicle restricted, but an OSV is allowed? This is disingenuous. A minimum snow depth does not necessarily protect

resources. A snowmobiler will make every attempt to avoid running on soil, gravel or pavement because damage to their machine is very costly. In this way, OSVs are self restricted.

Unnecessary snow depth requirements have substantial effects on recreation and add to the mistrust of the agency. Unreasonable restrictions on snow depth provides significantly less access for OSVs and does not enhance OSV enjoyment, in violation of the Purpose and Need.

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 is usually reasonable to protect snowmobiles from damage, but sometimes even a greater depth is needed. This is known by all snowmobilers, who will not risk damage to their machines.

USGS has conducted detailed snow depth research, but the FS has not used any of their data in the DEIS. They have also ignored all State and Federal snow survey data.

There is never more than 2" of snow on the windblown ridgetops, even when adjacent areas have deep snow. The snow on the ridgetops is hard ice that protects the underlying resources. There will always be significant snow depth variations throughout the management areas. There appears to be no consideration in the DEIS for the flexibility needed for such conditions.



The PNF must issue a supplement to the DEIS which describes a detailed site specific Snow Depth Management Plan to allow 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. 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 this information to be provided to the public so they are able to state their opinions.

Snow depth needs to be analyzed for non-motorized uses as well as motorized uses, because all uses have potential to touch the underlying resources. The DEIS fails to analyze any non-motorized environmental impacts, which is a fatal flaw in the document.

The DEIS states on page 20: “The interdisciplinary team agrees that designating a minimum snow depth requirement when considering areas to designate for OSV use was mutually beneficial and provided a means to minimize resource damage. Designating a minimum snow depth requirement provides a quantifiable and tangible mechanism for managing when OSV use occurs during times of the year when snow depths are most variable.” It is SAC’s position that a “mutual benefit” does not exist. A minimum snow depth is of no benefit to OSV because it limits access, particularly on roads in the fall and spring months. A minimum snow depth is a violation of the Purpose and Need, it is not supported by science of any kind, and therefore it must be removed from the FEIS.

The DEIS continues on page 20 to state “There is little scientific support for defining a universal, nationwide snow depth for protecting multiple resources. This is due to the variable nature of snowpack, and differences that occur regionally and nationally.” By the PNF’s own admission, using the Fassnacht et al. research paper from Colorado has no bearing on the Plumas National Forest and must be disregarded. The PNF has produced absolutely no applicable local research on snow depth.

The DEIS states on page 27 “The Forest Plan does not establish a minimum snow depth for trail or cross-country public OSV use.” If the FEIS establishes a minimum snow depth in violation of the Forest Plan, there must be an amendment to the Forest Plan.

Since this project has essentially turned into a nonmotorized project, there needs to be a quantifiable and tangible mechanism for managing nonmotorized snow use as well as for motorized. If this is not included in the FEIS, it is a violation of NEPA to designate areas as nonmotorized without supporting it with an evaluation and science.

Snow Depth Solution:

1. The FEIS should have no minimum snow depth restrictions. Law Enforcement Officers should simply continue to write citations for any winter users, whether motorized or nonmotorized, who cause resource damage under 36 CFR 261.15(h). This practice has been successful in the past and the DEIS has presented no evidence to suggest that situation would change.
2. If the FEIS contains a minimum snow depth restriction, a LRMP Amendment is required.

7. Classification of Roads and Cross Country

Roads inherently hold deeper snow than open cross country areas, particularly near the end of the season. Under Alt 2, technically the ungroomed roads could be shut down early if snow measurements are made in an open area that show less than adequate snow, while a road may have adequate snow.



Roads should be left open to OSV use, the same as they are for OHV use, with no snow depth restriction. There is virtually no difference between rubber tired and rubber snowmobile tracks on a Forest Service system road. No minimum snow depth is necessary for the protection of a road, and no resources will be damaged while traveling on a road.

Road Solutions:

1. The FEIS should have no minimum snow depth restrictions for roads. This would be consistent with the OHV Plan, which does not have a snow depth restriction for vehicles.
2. Impacts to roads must be analyzed in the FEIS.
3. All roads shown on the OHV Use Map must be shown on the OSV Use Map.

8. Staging and Parking Areas

There are no staging areas discussed in the DEIS. 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 potential locations for groomer sheds near the proposed trails. As part of this process, expansion of both the Lakes Basin and the La Porte Staging Areas must be considered. 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. Public safety is a key element in the Purpose and Need, yet it has not been evaluated in the DEIS.

Current lack of funds should not preclude the analysis of these issues, as there is the possibility of receiving funding from State grants or other sources for this work, provided the NEPA analysis is complete. The benefits of expanding the staging areas would be increased public safety and increased OSV opportunity, which are both stated in the Purpose and Need. It is disingenuous to separate facilities from the actual use. One cannot exist without the other.

Staging and Parking Solution:

Evaluate staging and parking areas for OSV at Lakes Basin, La Porte, and Lake Davis, to provide for public safety.

9. Conflict

The Purpose and Need for the project is to manage OSV use to "minimize conflicts among the various uses". It needs to be stressed that there is a difference between "use conflict" and "user conflict". Use conflict is based on historical or expected use, while user conflict would occur on an individual basis. SAC submitted a FOIA request to the PNF asking for documentation of user conflicts, and the PNF was unable to produce any documents, which supports our contention that there is no documented user conflict.

The PNF has repeatedly implied 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.

A summary of that 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 OSV public meetings, Plumas County Sheriff Greg Hagwood stated the proposed restrictions in the Lakes Basin and other areas will create problems and conflicts where none currently 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.

The Purpose and Need for this project is to minimize impacts. Closing an entire area to historical OSV use actually creates conflict where there was none before.

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 conflict, in violation of the Purpose and Need.

Conflict Solution:

Remove all references and resulting restrictions based on "user conflict" from the FEIS because there is no documentation that user conflict exists.

10. Bucks Lake and Lakes Basin Non-Motorized Trails

The DEIS calls for grooming the non-motorized Lakes Basin Ski Trail 12E44 but prohibits OSV. This trail was built using State OSV grant funds, which was the Plumas NF's first mistake. There are problems with overcrowding in the parking lot due to nonmotorized users and their blocking the pull through slots that are intended for trucks and trailers. State OHV Division prohibits grooming areas where OSV is prohibited. The trail has major drainage issues and is too narrow for the new groomer machine. For safety, this trail must not be groomed which will minimize conflicts.

Bucks Cr Loop 7E11 - This trail is never used by non-motorized users, who opt to use the groomed county road for access to the Bucks Lake area. Judy Schaber of the PNF said a local use inventory

showed no use by non-motorized users, who use the groomed county road rather than the Bucks Cr. Loop Trail. The trail has tree wells which makes it undesirable for nonmotorized users. The trail must not be designated for nonmotorized use because it causes a barrier between the county road and the popular Manzanita Hill OSV play area. Restricting OSVs to cross this trail is a violation of the Purpose and Need.

Non-motorized Trail Solution:

1. Nonmotorized users should use the parking area at the Graeagle Creek and Graeagle Creek Tie (12E23 and 12E28A) along the Gold Lake Highway. This would alleviate the overcrowding at the Lakes Basin OSV staging area.
2. The Lakes Basin Ski Trail must not be groomed due to safety issues.
3. The Bucks Creek Loop trail is rarely, if ever, used by non-motorized users. Due to the lack of use, this trail should not be restricted to OSV riders who need to cross it near the old dump site in order to access the Manzanita Hill OSV play area.

11. Economics

OSV use in the Lakes Basin, La Porte, Bucks Lake and Lake Davis areas are vital to the winter economy. Lakes Basin and La Porte are rare, scenic, high elevation areas 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 the county's fragile winter economy. Lake Davis is another area that could attract out of area OSV riders, if there was adequate parking, grooming, and areas open to OSV use.

The Forest Service held several public meetings a few years ago to discuss winter management at Lake Davis, and said the information they collected would be carried forward to the Subpart C analysis. But there is no evidence of this happening. This is currently a high use ice fishing lake, and it also has great potential for OSV use.

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."

<https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=2&ved=2ahUKEwixraj2iP3fAhWgGTQIHAYvAzAQFjABegQICRAC&url=http%3A%2F%2Fohv.parks.ca.gov%2Fpages%2F25010%2Ffiles%2Fosv%2520program%2520public%2520deir%2520oct%25202010.pdf&usq=AOvVaw2deCWuYzjVOfm1nk7qjuCE> 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>).

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 will cancel their plans to travel to the Plumas NF in fear of the trails being shut down unnecessarily.

The geographic areas around the five forests who have recently undertaken OSV Designation projects represent some of the least-advantaged areas in the state. With the cessation and elimination of traditional sustaining economic activities such as logging, these rural counties economies are very fragile. Any changes for motorized winter recreation access will cause further extreme hardship in these areas.

The “American Council of Snowmobile Associations (ACSA) Facts and Myths 2014” published economic information that must be included in the FEIS. This documentation was submitted to the Enterprise Team at the Quincy meeting in 2014 at the Mineral Building, but apparently it has not been used by the PNF. It must be used in the Economics analysis in the FEIS.

The DEIS states that OSV generates 53% more spending than Cross-country skiing. Yet Alt 2 closes many important areas to OSV and overcrowds the approved areas, which will discourage OSV users from traveling to our county. The restrictions have a negative result on the county revenues but the Economic Analysis does not recognize this fact.

The Socio-Economics Methodology Economic analysis using the IMPLAN modeling is based on egregious and bias data collection. The OSV analysis is based on a Forest Service Exit Survey model to project OSV use. Exit interview collection points were staffed from 0600 hrs to 1200 hrs. This resulted in inaccurate OSV use data. The vast majority of riders do not return to the staging area before noon, but will spend the entire day riding. Also as the snow conditions changed so did the staging and riding but the data collection location did not change to capture the change in use. This photo shows inability of the exit interview staff to adjust where the riding takes place which produces skewed results that are multiplied many times over, then normalized.



The DEIS makes the devastating and damaging assumption that OSV use would decline by 50%. This is a significant error in the analysis which is not based on accurate local use data and local knowledge.

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. The economic analysis in the DEIS is deficient and unacceptable.

Economic Solutions:

Provide an in depth analysis for local economics in the FEIS, coordinated with local county governments, tribes, local Chambers of Commerce, and businesses. As a minimum, the economic analysis must address how restriction and/or expansion of the trail system and access area may:

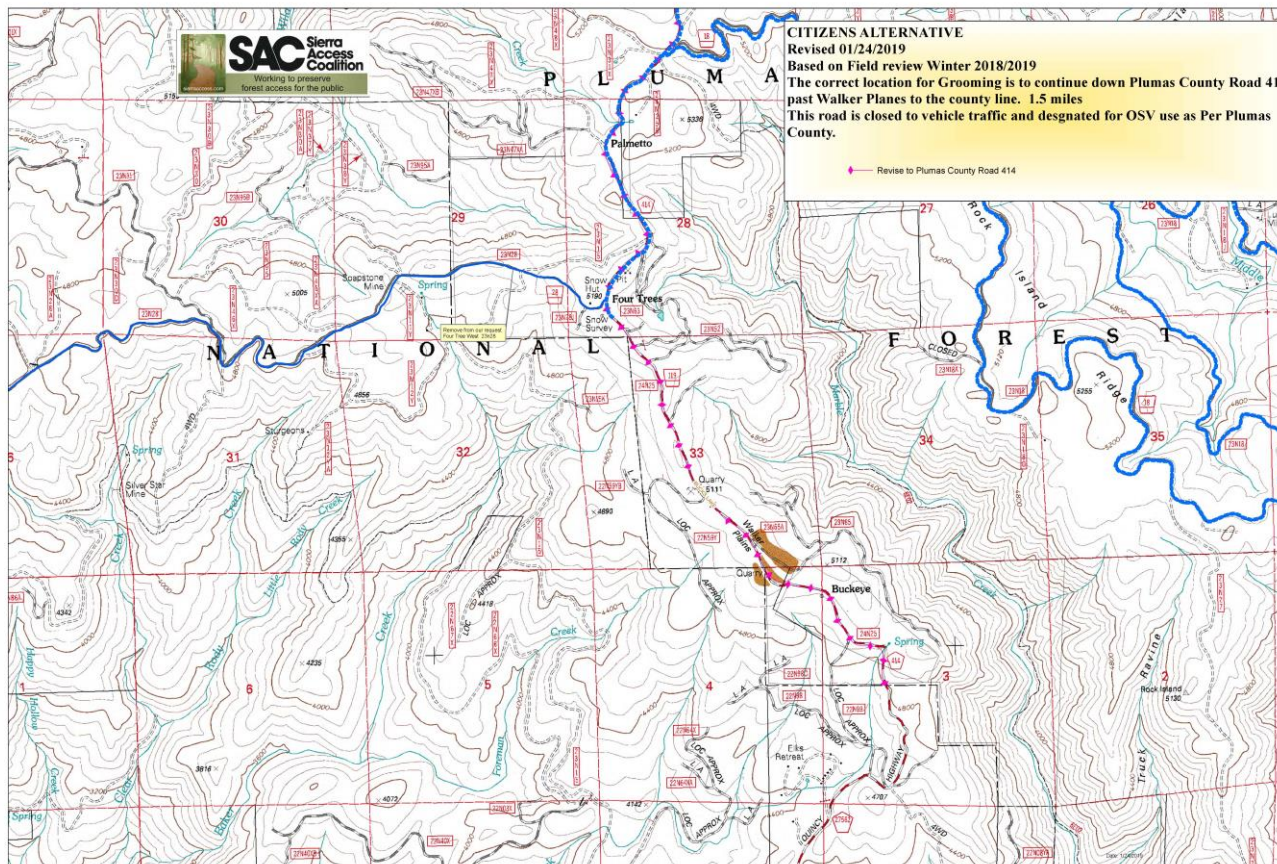
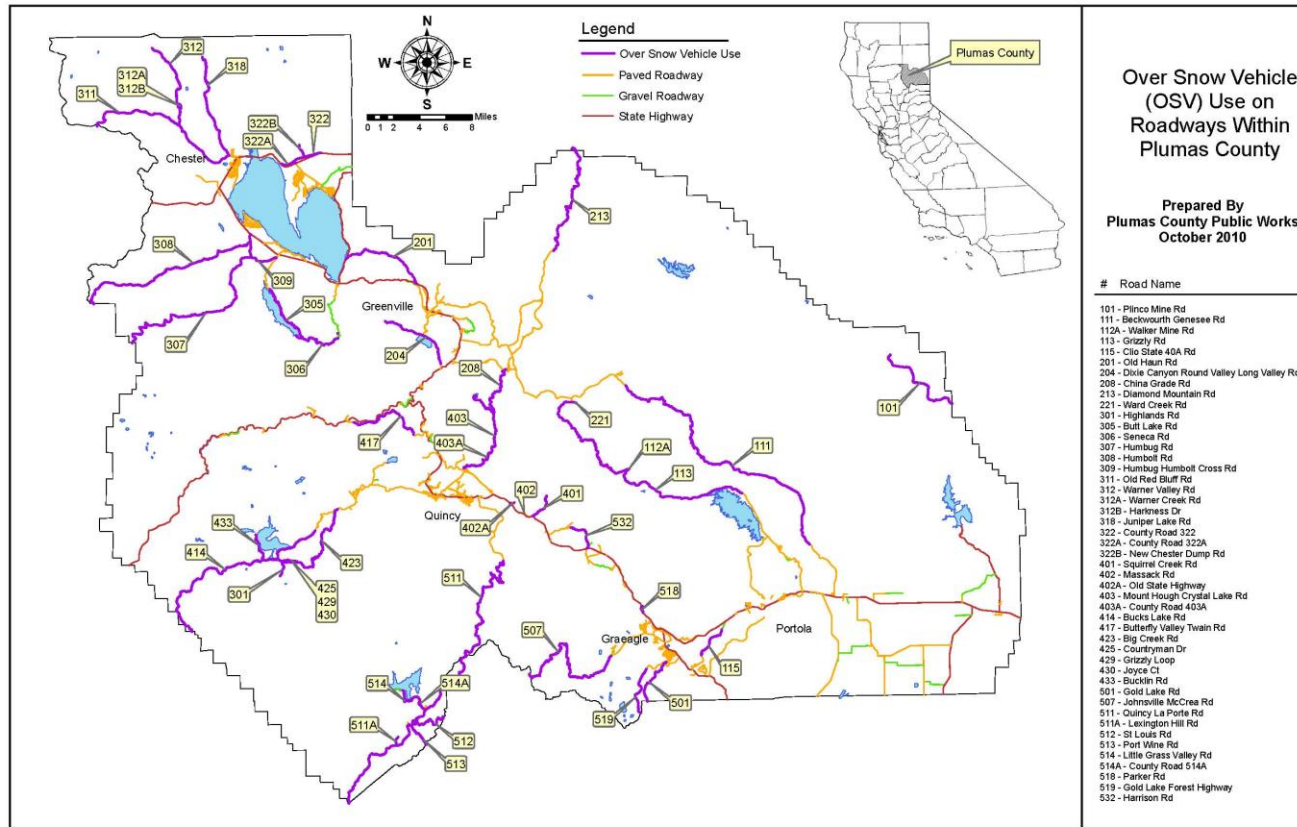
- a) Increase/decrease the Transient Occupancy Tax that benefits rural counties and towns.
- b) Potential increase/decrease of gross sales including gas, repairs and accessory purchases related to snowmobiles
- c) Increase/decrease of sales tax income to rural counties and cities.
- d) Potential loss/gain 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.

12. Additional Grooming

We understand the State OSV program does not always have the funds to groom additional trails. However, occasionally there are additional funds available such as the \$10-million increase at the State OHV Division recently. Also the new groomers are more fuel efficient which allows grooming of more mileage for the same cost as they did in the past. So current lack of funds for groomed trails should not preclude the analysis of these and other groomed trails in the OSV study. Therefore, we propose the following trails be approved for grooming, should funding become available in the future:

1. Road 24N89X in section 16, which the PNF recently acquired, should be groomed to the west rather than continuing north towards the Wilderness boundary, to prevent trespass. The current location is not an adequate turn around area. In SAC's NOI comment letter we submitted the electronic data for the preferred location. This location would benefit everyone, as there's a better turnaround area for OSV and it would no longer lead towards the Wilderness.
2. The Lower Bucks Ungroomed Trail 24N24 towards Three Lakes should not be approved. There is a significant safety issue on that trail so use should not be encouraged. This would meet the Purpose and Need for safety.
3. Grizzly Forebay Ungroomed Trail 24N34A leads into a bald eagle area. The point on the road in the saddle of 24N34 is windblown and very dangerous. If PG&E needs this trail for their operations, it should be added to their Special Use Permit. But should not be designated for OSV public use.
4. The road from Four Trees warming hut to Walker Plains must be groomed continuing the county line, which is consistent with the Plumas Co Winter Road Closure map (attached). This is a county road and coordination must be

done with Plumas Co. Dept of Public Works to allow this grooming. Walker Plains is a popular destination.



5. The entire loop of the Sherman Bar Trail 24N28, as mapped in our NOI comment letter proposal, should be available to groom if funding becomes available in the future. Please use the GIS data previously submitted by SAC.

13. Barriers to OSV areas

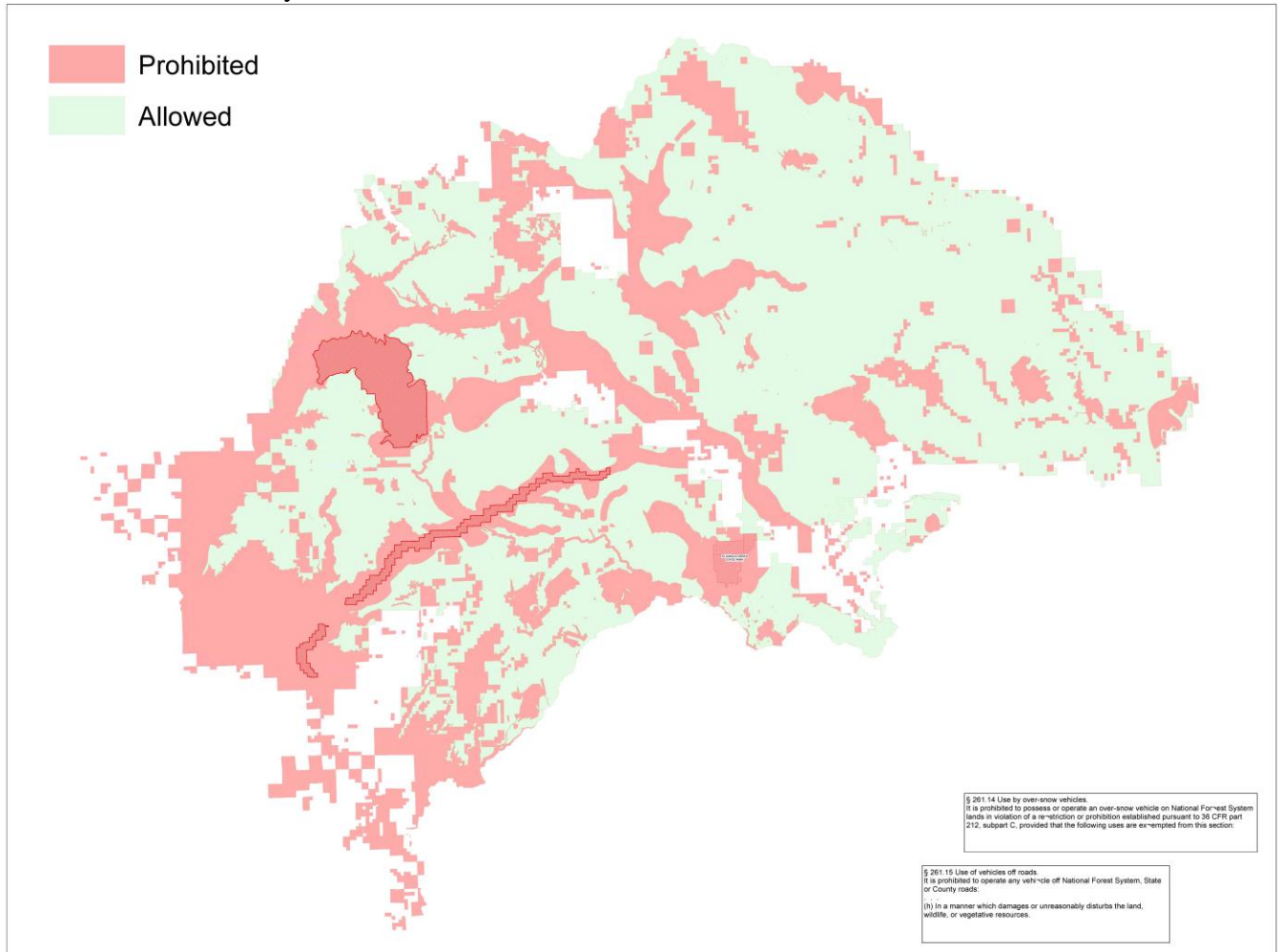
Dates must not be used indiscriminately to prohibit OSV use. Below is a photo of adequate snow November 9, 2017 during a drought year with little snow. Data is not presented in the DEIS to determine a suitable date for the OSV season. In lieu of dates, the season needs to be based on adequate snow at a specific location. Similarly, one measurement of snow in a Management Area cannot be used to restrict OSV in other areas within a Management Area.



Some closures may seem insignificant, but are actually creating significant barriers to OSV. The following are problem areas that need to be resolved:

1. The area to the east of the Silver Lake Road is a part of a continuous barrier. The map in the DEIS makes it appear that there is OSV access to the area to the north and east of Silver Lake. However, what appears to be a small restriction creates a large barrier to adjacent areas that are currently used by OSV.
2. 25N17 near the old Meadow Valley Lumber Co. mill is in the restricted area, so OSV cannot access the large area to the north.
3. Need to change classification for 50" width restriction. What is the reason? We need to get clarification.
4. Bagley Pass needs to be designated as open to all vehicles on the map. OSV users need access up Bagley Pass, to Mt Ingalls and the loop back to Bagley, as SAC submitted previously.
5. The 3500' elevation restriction must be based on accurate elevation data. Poor data is eliminating many areas that receive adequate snow. Satellite imaging analysis is not able to capture the true use of some lower elevations.

6. The Alt 2 map shows trails that are designated for under 50" width. This classification will exclude side by side machines with tracks. The 50" width restriction must be eliminated to allow all OSV vehicles to access the trails. The DEIS does not analyze this restrictive class of vehicles, which are highway legal according to the CVC and are allowed to travel on county and state roads.
7. The map below is an overview of the entire PNF which displays how closures, usually at the lower elevation of an area, can act as a barrier to the much larger areas beyond them. These are most likely unintended barriers.



We are submitting our comments via US Postal Service mail, since the government is currently shut down. Included with our submittal is an example of the costly damage that can be done to snowmobiles if they are operated without adequate snow. Hifax meltdown is an expensive repair costing approx. \$300 and the damaged "A" arm costs \$500. Please consider these damaged snowmobile parts as Exhibits 1 and 2, respectively, in our comment letter. It is significant evidence which demonstrates why OSVers will make every attempt to ride only when there is adequate snow depth to protect their machines. In this way, OSVers are self-policing the snow depth. These damaged parts are submitted as exhibits in our comment letter and must remain attached to our letter.

We have several unanswered questions due to the public meetings that were cancelled during the government shutdown and no personnel have been available to provide answers. We reserve the right to submit additional comments after we get answers to our questions, hopefully in a public forum, after the government reopens. We trust the Plumas NF will act in good faith.

Thank you for the opportunity to comment on the Plumas National Forest Over-Snow Vehicle Use Designation project. 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
California Off Road Vehicle Association
Sierra Snowmobile Foundation
Bucks Lake Snowdrifters
Sierra Buttes Snowbusters
Butte Meadows Hillsliders
Friends of Independence Lake
Recreation Outdoors Coalition
Paradise Ridge Riders