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Lassen National Forest
Forest Supervisor
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OBJECTION -- Lassen National Forest Over-Snow Vehicle Use Designation Project

Sierra Access Coalition (SAC) is a group of over 1450 members who work to preserve access to our public lands. This objection is being filed on behalf of SAC's members pursuant to 36 CFR Part 218.

SAC submitted comments during each phase of this project, as well as attending all public meetings and staying very active throughout the process including filing an objection to the original FEIS in 2016. We participated in the stakeholders group and were able to resolve many issues with the non-motorized users. Several of our issues and concerns have yet to be addressed or resolved, which makes this objection necessary.

We object to this decision because the ROD is in violation of several laws and regulations:

1. The ROD is not consistent with the Lassen NF Land Management Plan and does not provide for a LMP amendment. The ROD closes 36% of the motorized Recreation Opportunity Spectrum (ROS). This is a violation of FS regulations.
2. The decision is not consistent with the Purpose and Need which states this project will "enhance public enjoyment". The decision favors non-motorized use at the expense of motorized users because it eliminates many important areas historically used by OSV, yet not a single area has been closed to non-motorized use. Mitigation for the resulting impact to OSV was not considered or analyzed. These items are violations of NEPA.
3. The decision is not consistent with the Purpose and Need which states "Effective management would provide public OSV access", when it actually closes 36% of the motorized ROS. Many favorite areas used by OSV are closed by this decision and in many respects this project turned into a non-motorized project. The decision is in violation of the Purpose and Need.
4. The Purpose and Need also states it will "minimize conflicts among the various uses". Closing areas that have historically been used by OSV is actually creating conflict where the LNF has stated no conflict existed before. This is not consistent with the Purpose and Need and is a violation of NEPA.
5. The ROD states OSV use is declining. This is not factual, but it is used as a basis for the decision. According to the DMV, OHV registration has steadily increased over the past decade and is at an all-time high. The FS did not seek out this information, which is readily available. Instead they based their decision on an incorrect assumption that OSV use is declining. This is untrue and is a violation of NEPA.

6. Item #3 on page 3 of the ROD says 201,100 acres are being closed to OSV but the document doesn't disclose the location of these additional areas. The map and ROD don't show enough detail to allow the public to understand what additional areas are being closed. This is a violation of NEPA.
7. The areas designated for non-motorized use did not receive the same analysis for "adequate snow" as the motorized areas. Snowmobiles, snowshoes, and skis all exert approximately the same psi in snow. Since they all have the same potential to cause resource damage, the non-motorized use requires the same analysis for "adequate snow". Ignoring this fact has caused the FEIS and ROD to be inadequate regarding minimization of resource damage, as required by the Purpose and Need. This is a violation of NEPA.
8. The Purpose and Need states it would analyze direct and indirect impacts to the environment. Wildlife historically depend on many OSV trails for winter travel. The analysis did not consider how the loss of these trails will affect wildlife, which is an indirect impact. This is a violation of NEPA.
9. NEPA requires a scientific analysis of the impacts to the human environment was not adequately considered, including a comprehensive economic analysis. This is a violation of NEPA.
10. The LNF has not coordinated OSV law enforcement issues with local Sheriff's Departments in any of the counties within the LNF, which is a violation of the Travel Management Final Rule.
11. The Final Rule states it is illegal to possess a snowmobile within undesignated areas. However, the FS didn't consider provisions for cabins on land that is leased from the FS, or residences adjacent to undesignated areas where the only winter access to their residences is via snowmobile. This is a violation of 36 CFR 293.12.
12. Not designating roads as ungroomed trails creates several access issues. This is a violation of the Purpose and Need.
13. We object to the proposed buffer along the Pacific Crest Trail which, as the ROD states, is "largely a solution in search of a problem." We agree with this assessment. The buffer was rejected in the draft ROD, but if that decision is going to be reconsidered to be reversed in the Final ROD we want to reserve the right to submit additional objections before the final decision.
14. There are inadequate crossings of the Pacific Crest Trail. This creates barriers and public safety issues. This is not consistent with the PCT 1982 Management Plan.
15. Several areas are proposed for closure to protect yellow-legged frogs and their habitat. However, the science to validate that OSV impacts the frog has not been produced in the RFEIS. In the past, FS biologists have stated the YLF overwinter at the bottom of lakes, so OSV would have no impact. This is a violation of NEPA.

Possible Solutions to the above listed objections:

1. Open more areas within the motorized ROS and write an amendment to the Lassen Land Management Plan.
2. Reanalyze the OSV Designation Project as required by the Purpose and Need to "enhance public enjoyment", and where areas are restricted the FS must consider mitigation measures.
3. Reanalyze the OSV Designation Project to provide more effective management and more OSV areas within the motorized ROS (see details later in this document).
4. Eliminate "user conflict" from the decision-making tree, so this decision will not create conflict.
5. Reanalyze the project using the correct OSV statistics and eliminate the flawed exit surveys to remove this bias.
6. Disclose this information to the public. Clearly display in maps and summarize where the 201,100 acres are so the public can comment on them.
7. Analyze "adequate snow" for resource protection equally for all users, including both motorized and nonmotorized.
8. Analyze for wildlife use of OSV groomed and ungroomed trails.
9. Analyze for the human environment, as required by NEPA. Under the Multiple Use Sustained Yield Act, none of the uses of the forest can be considered more important than the others.
10. Coordinate with all the Counties within the LNF boundary, Boards of Supervisors, Sheriffs Departments, and other local agencies including, but not limited to, State Fish & Game.

11. Designate all roads within undesignated areas as ungroomed trails, to allow movement of snowmobiles from private land to designated OSV areas.
12. Designate all roads as ungroomed trails to provide access.
13. Do not change the decision regarding the PCT buffer as written in the ROD. If there are discussions in the future about changing this decision, SAC wants to be present for the discussions.
14. Designate all existing, legal road crossings of the PCT as well as a few additional crossings that are necessary to prevent barriers. (See the attached GIS file and Map Legends PCT Crossing Displays file)
15. Reanalyze for impacts to yellow legged frogs, since they overwinter at the bottom of lakes. There should be no impact to the frogs from OSV use.

In addition to the above violations of law and regulation, we have several more objections to the ROD:

Snow Depth Restrictions

SAC objects to snow depth restrictions because they are unnecessary, unenforceable, arbitrary, and not supported 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.

One of the ROD’s examples of resource damage is “soil mixed with snow”. OSV traveling on roads with minimal snow in some areas may occasionally create soil mixed with snow, but this doesn’t damage natural resources because the road has already been cleared with previous NEPA analysis. The wording in the ROD should be changed to “soil mixed with snow in cross country areas where the 12” snow depth is required.”

The ROD states the 6” and 12” snow depths “*appear to be accepted*” by specialists, but there is no documentation to show how these snow depths were determined. Personal opinion cannot be substituted for science. 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 numbers, the ROD should simply state 36 CFR 261.15(h) will be used to write citations in cases where there is resource damage. Rigorous law enforcement is more effective than just writing words in the ROD. Enforcement based on resource damage would eliminate the inherent problems with snow measurement throughout the Lassen NF which may include:

- Lack of personnel to measure snow depths throughout the LNF on a daily basis.
- Timely posting of snow depth to websites, including weekends and holidays when staff may not be available.
- 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.
- The term “adequate snow” would more accurately be defined as the depth of snow that is required to operate a snowmobile according to manufacturers’ recommendations, and which does not cause resource damage. These are one in the same.
- Arbitrary snow depth measurements would only be a futile attempt to manage OSV, and could even open up the Forest Service to lawsuits.

The photo below is example of how measurement of snow depth is not a valid method to protect resources. Obviously OSV will not be riding on the hillside, but the road has adequate snow to ride while still protecting the resources. This is a typical of ground conditions in spring.



A scientific analysis or description of “adequate snow” was not performed for the RFEIS. A scientific analysis of snow depth would require, as a minimum, consideration of:

- Snow density
- Snow compaction
- Temperature
- Aspect
- Time of day
- Location
- Holding capacity (ie. a snowmobile cannot compress water or ice)

None of these factors were identified as a significant issue and analyzed in the RFEIS. The snow depth restrictions in the ROD are simply arbitrary numbers which are not supported by science, documentation, or any credible analysis which is a clear violation of NEPA.

Nothing in the RFEIS presents any science to support the proposed arbitrary snow depth restrictions. The ROD states the specialists “appear to accept a 12-inch minimum as sufficient for resource protection”, which is an outrageous statement to make in a document that is required to be based in science. There is no science or expert testimony included in the RFEIS to support the “acceptance” of the arbitrary 12” snow depth. NEPA requires *scientific analysis by professionals*, not personal opinion or simply the “*acceptance*” of an arbitrary number.

In the DEIS and FEIS, the SHPO Programmatic Agreement was cited as the basis for a 12” minimum snow depth. However, this agreement was specifically for winter logging operations which requires, among other things, for each cultural site to be flagged and avoided. The agreement was never intended for OSV use. So it is not applicable and we object to it’s use in this analysis.

Solution:

Allow OSV users to determine when there is adequate snow rather than have a snow depth restriction.

Snow Depth in Non-motorized Areas

The ROD designates several non-motorized areas, but those areas had no analysis for adequate snow. There is no mention in the RFEIS of an adequate snow depth for skis or snowshoes. Remarkably the ROD has set aside areas for non-motorized use without any analysis whatsoever regarding potential resource damage. Snowmobiles exert 0.5 psi pressure. Snowshoes have 0.5 psi. Skis are variable but have very similar psi. Non-motorized users are not unlike OSVs in this regard. To be consistent, non-motorized users (skiers, horses pulling sleds, etc.) must be regulated the same as for motorized users. All users, whether motorized or non-motorized, have potential to cause resource damage. This was not addressed in the analysis, which is required by NEPA. No science was used to determine if other depths, such as 6" of snow rather than 12", or simply 2" of ice, would also meet resource protection objectives. The RFEIS must be deemed inadequate due to its lack of scientific analysis.

On page E-19 of the FEIS, the FS agreed with SAC that there has been no documentation regarding damage to resources in 40+ years of OSV use. This further supports the argument that there was no scientific basis for choosing a snow depth to protect resources. If protecting resources is the FS's main objective, they already have a CFR that allows law enforcement to write tickets for resource damage -- 36 CFR 261.15(h). Stating a minimum snow depth is neither necessary nor enforceable, because only this CFR allows LEOs to write citations. The snow depth written in the ROD cannot be used to write a citation. There was no coordination with county law enforcement regarding this issue, which is another violation of regulations.

The RFEIS identified three concerns that create the need for snow depth restrictions: cultural resources, natural resources, and public safety. Inherently there are no cultural resources or botanical resources on existing NFS road surfaces. Page 232 of the FEIS states the Travel Management OHV analysis already analyzed for cultural resource concerns, and the same is assumed for botanical resources. So these resources on roads were not reanalyzed for this project. Roads are designed and constructed to allow vehicles to contact the road surface in both wet and dry weather. Accordingly, these system roads should have no minimum snow depth restrictions, since there are no resources affected. On March 5, 2016 Chris O'Brien had a phone conversation with Kyle Felker of SAC. Chris stated damage to the LNF road system by snowmobiles has never been an issue. We want all system roads to be mapped and included on the OSV map as designated ungroomed trails. It is particularly important to include system roads across private land where the FS has a legal right-of-way. The FS failed to identify any right-of-ways in the RFEIS, which is a significant omission that creates a barrier to public lands beyond the private land. Alternative 1 doesn't even show the trails with right-of-ways, so it is not an accurate depiction of current OSV management.

Snowmobiles need the flexibility to be allowed on ungroomed system roads. Snowmobile use restrictions must not be tied to any grooming or designated snow trail requirements. These are separate activities that need to be managed differently. OHVs are allowed on roads when there is snow. It is disingenuous to have two different regulations for motorized use, which could occur concurrently in snow. Roads are designed for vehicles to drive on the soil surface. The distinction is whether the user, whether motorized or non-motorized, causes resource damage. OSVs have much less potential for impact than OHVs, pickups or log trucks, so it is illogical and disingenuous to restrict OSVs in the same situations where OHVs are allowed.

Solution:

Conduct NEPA analysis for non-motorized users so the snow depth requirements are consistent for motorized and non-motorized users.

Local Issues

SAC and other stakeholders worked hard to agree on motorized and non-motorized use in several areas. We are pleased to see the Forest Service took some of our recommendations on Fredonyer, Almanor, Butte, Diamond, and Eagle Lake. After the Draft ROD was published, Ted McArthur and Chris O'Brien agreed to use the stakeholder's maps for Colby and Goumaz in the Final ROD. However, we still dispute some of the remaining areas:

Colby: We object to the closure north of the Colby Ski area up to Hwy 36. This was not recommended by any of the members of the stakeholders group.

In regards to the Sierra Nevada yellow legged frog, there are several references to SNYLG in the RFEIS:

- *There is "no known extant populations on the Lassen NF"*
- *"Because they are not present and not suspected of occurring within areas currently or proposed for OSV use, the ... species would not be affected"*
- *"Sierra Nevada yellow-legged frog may spend up to nine months overwintering under ice in lakes and streams"*
- *"Frogs have been found overwintering in the bottoms of lakes and in protected nearshore microhabitats including deep underwater rock crevices under banks and under ledges (Bradford 1983, Matthews and Pope 1999)."*
- *"OSV use during the winter is not expected to result in habitat disturbance because the minimum snow depth of 12 inches is likely sufficient to prevent contact between OSVs and the soil surface."*

The RFEIS does not provide data to support closing the Colby area due to SNYLF.

Solution:

Do not close the Colby area.

McGowan: The McGowan Lake area in the Morgan Summit Area is extremely important to OSV to provide access to 31N17 and points beyond. In 1982 the 29N22 road from Hwy 89 to the 31N17 road was designated as non-motorized and OSV use was prohibited. This designation created a problem for motorized recreation to connect one designated OSV area with another popular area to the west. Through this process the motorized public requested that a portion of the designated road be changed to shared use and requested that all the land from the requested change at the 29N11Y road to Hwy 89 be then designated non-motorized allowing for quiet recreation in a huge area. The LNF has assured us many times that motorized shared use would be allowed from 219N11Y to 31N17. However, every map the LNF has put out does not show this change. There is no written description or map displaying what the plan is for this area in the RFEIS or ROD. When contacted, the forest again said it is a mapping error and they would fix it. The maps in the ROD and RFEIS are still not correct. We object to the ROD because it does not describe or display what is restricted in this area which is of great importance to the OSV community.

Solution:

Provide a map and description that clearly shows this road is open to OSV Use.

Morgan: The forest has proposed to close more area near Childs Meadows in the Morgan Summit Area as identified in Alt 5. This has never been mentioned except in Alt 5 so the public was not aware of this desired change or the need to comment on this potential closure. We believed Alt 4 was the desired outcome. The area between Mill Creek and 29N25, including Doe Mt has, since the inception of the Share the Dream trail proposal been the route of the trail. Closing this portion of the forest would eliminate any chance for this trail to be completed. This area must remain open to OSV.

The north portion of the Childs Meadows does not show up well enough on the map for the public to see just where the lines are. We have been told that the closure line is the line of the Wild Cattle Mt. proposed wilderness area but there is nothing in writing to verify this. We object and this needs to be clarified in the Final ROD. The rationale for the closure is to protect important habitat and to protect Sierra Nevada yellow-legged frog habitat. However, the science to validate that OSV use would harm the habitat or frog could not be produced. In the past, FS biologists have stated the YLF overwinter at the bottom of lakes, so OSV would have no impact.

The Morgan area is designated closed to OSV due to winter deer habitat. This is not logical. Deer don't dig in the snow to find feed, they naturally move to lower ground to find food. So there is no substantial conflict between deer and snowmobiles. A wildlife biologist from Fish & Game in Susanville confirmed this, even though his department was not contacted during the analysis. This area needs to be designated as open to OSV.

Solution:
These areas must remain open to OSV.

Shasta and Fall River: This area borders the Shasta-Trinity NF, which has excellent OSV opportunities and adequate snow. The area should not have OSV restrictions, so seamless OSV opportunity is available from the LNF to the STNF. The Stakeholders group did not agree to any additional closures such as Shasta and Fall River management areas. The ROD designates the Shasta and Fall River areas for closure due to historically low snow. This does not meet two objectives of the Purpose and Need, which are: ensure that OSV use occurs when there is adequate snow, and enhance public enjoyment. It is true that the area doesn't receive a lot of snow. But when it does, local residents are excited to go out and use the area. They should not be restricted from using it during the short but valuable season. The lava areas are not good riding, but the roads are. The ROD seeks to "avoid" conflict with the state park which is not even shown on the map. There are no documented conflicts with the park. Again, the ROD has overstepped the intent of the Purpose and Need, which says only to "minimize", not exclude areas of possible conflict. If the area was designated open for OSV, that season would be so short that possible conflicts would be minimized, which would meet the Purpose and Need. The ROD also states that overall this area offers "poor opportunities", which is false. The special snow events should continue to be enjoyed by all. This area will close itself so there is no need for it to be designated as closed. The area proposed for closure due to the Spotted Owl has vegetation that is too dense to allow snowmobiles. So that area does not need a restriction because it will never be used by OSV. The ROD says this area should be closed to OSV to avoid use conflicts for "quiet recreation", but there has never been a definition of "quiet recreation". The Purpose and Need is to "minimize" conflicts, not to close entire areas to "avoid" possible conflicts.

Solution:
These areas must remain open to OSV.

Jonesville: All members of the stakeholders group agreed that the Jonesville area should be open to OSV. The ROD states it should be closed to “avoid conflict”. The objective of the Purpose and Need is to “minimize conflict”. However, there is no documented conflict. We strongly object to closing this area, which violates the Purpose and Need.

Solution:

This area must remain open to OSV.

Swain Mountain Area: The ROD states “An area in the southeastern corner will not be designated for OSV use to allow for non-motorized quiet recreation.” There is no explanation for this decision and no explanation as to the exact location or area size. The map is not of sufficient detail to allow the public to see where the closure will occur.

Solution:

Provide more information to support this analysis so the public can comment. Keep this area open to OSV.

Pacific Crest Trail

We are pleased the ROD did not apply a 1,000-foot non-motorized buffer around the PCT (500 feet either side) that would have been unnecessary, unmanageable and unenforceable. However, we have strong objections to any PCT buffer and request to be involved in further discussions if the buffer, which is not consistent with the PCT Comprehensive Management Plan, is being reconsidered.

There are approximately 97.7 miles of the miles of the PCT that would be within an area designated for OSV use under Alternative 4 (p. 43, RFEIS). Motor vehicles are prohibited on the PCT in accordance with the 1968 National Trails System Act (Section 7(c)). and 1982 PCT Comprehensive Management Plan (PCT Plan).

“The intent of Congress in prohibiting motorized use of the trail, as expressed in the Hearing Documents, reference (S. 827 and H.R. 4866), was to eliminate the safety and noise conflict with hikers and equestrians. Crossing the trail right-of-way by snowmobiles would not be in conflict with the intent of adjacent to the trail” (p. 85 of Plan PDF).

The Draft ROD will designate only 17 public OSV crossings of the PCT. The PCTA states “the sounds of OSV use will have a significant impact on PCT users” (PCTA FEIS draft ROD objection letter, 9/30/16). The PCT Plan states:

“Snowmobiling on the PCT is prohibited but crossing at designated locations is consistent with the purpose of the trail when such use is permitted on lands adjacent to the trail and does not cause damage to the trail, related resources, or facilities” (p. 76 of Plan PDF).

“Winter use (cross-country skiing and snowshoeing) should be accommodated where practical and feasible. Each agency should follow its own procedures for marking and signing the trail for winter use purposes. As a guideline, all trail markers should be at eye level (approximately 40" above average maximum snow dept” (p. 66 of Plan PDF).

“Winter sports brochures should indicate designated snowmobile crossings on the Pacific Crest Trail 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” (p. 27 of Plan PDF). The PCT Plan also says: “Each local plan will consider the guidance, direction and objectives from the Comprehensive Plan in dealing with the opportunities, issues, problems and resource situations unique to its area of trail responsibility” (p. 66 of Plan PDF).

We found no description of documented user conflicts specifically related to OSV travel on or adjacent to the PCT or physical impacts on the trail tread. Per Chris O’Brien on November 16, 2017, there are no known conflicts between PCT users and OSV recreation. Only hypothetical conflicts between OSV and nonmotorized users are described in the RDEIS. The PCTA has no data on the number of users on the PCT when the trail is under several feet of snow (per Justin Kooyman). The RFEIS does not say the PCT is signed or otherwise marked for winter use or describe how many people enjoy the trail in winter.

We know the PCT is not a winter trail. The PCTA website discourages snow travel. “Traveling the PCT when it’s covered in snow means exposing yourself to potential avalanche risk. The PCT was not designed for travel when snow is on the ground. In many places, it’s unwise to travel the trail during these conditions. Areas along the trail are well known for their avalanche danger. Seasonally, specific snow travel and avalanche preparedness skills are critical. It’s highly unwise to unknowingly expose yourself to this hidden danger.

Cold temperatures, freezing rain and early winter snowfall compete with many hikers’ desire to complete the Pacific Crest Trail in one season. We’ve seen the results, when “summit fever” outweighs rational thought. Your decisions may not only put you at risk of serious injury or death, they can put the lives of rescuers in peril as well” (PCTA.org under Snow Information).

We are not aware of any winter use signs or markers that have been placed along sections of the PCT where skiing or snowshoeing is planned or occurring. The PCTA has no visitor counts along the PCT to track the location and frequency of visitor use. The Draft ROD acknowledges

“... the PCT receives very few travelers during winter months largely due to the amount of snow covering the trail (and forest access roads to the trail) through much of the forest. Moreover, the Pacific Crest Trail Association itself does not recommend hiking on the trail during the winter months, largely for safety reasons” (p. 7, Draft ROD).

The LNF used 10 miles from a plowed trailhead to evaluate ease of access to a non-motorized area. If a non-motorized area is more than 10 miles away, then user access is considered limited due to the longer travel distance. In their response to comments, the LNF indicates: *“We have modified the analysis to reduce the radius of a daily non-motorized trip from a plowed trailhead. We’ll assume a radius of 5 miles from plowed trailheads. This is more representative of a typical non-motorized day trip (5 miles out and 5 miles back)” (p. 928, RFEIS).* SAC agrees with this assumption – skiers or snowshoers will likely travel 5 miles or less on the PCT from a plowed trailhead. Therefore, designated OSV crossing should only fall within this 5-mile radius only when 1) there is a plowed trailhead, AND 2) where the PCT is signed and marked for winter use consistent with direction in the PCT Plan. Designated crossings are not needed or required by the PCT Plan at any other locations and snowmobilers may cross where desired if there is no resource damage.

We agree with the Draft ROD that the proposed PCT buffer “*was largely a solution in search of a problem*” (p. 7, Draft ROD). The same can be said for designated OSV crossings of the PCT when winter visitor use is non-existent on most of the 97.7-mile trail.

Solution:

Designate all existing legal road crossings of the PCT, all crossing areas within 5 miles of a plowed trailhead where the trail is marked for non-motorized users, and a few additional crossings that are necessary to prevent barriers.

(See the attached GIS file and Map Legends PCT Crossing Displays file)

Other Issues

The FEIS says noise is not a significant issue so it was dismissed from further analysis. However it has become an issue in the ROD. It is disingenuous that several areas are being restricted from OSV use to provide “quiet recreation”. It is even harder to understand why areas that are set aside for skiing and snowshoeing have not undergone the same analysis for adequate snow and resource damage as the motorized users have been subjected to. Please provide us with a definition for “quiet recreation”. (ie. acceptable noise levels, required distance from motorized areas, etc.) We support nonmotorized use of our National Forests, but the RFEIS and ROD did not properly analyze for that use.

Please explain why this project does not require a LMP amendment. Please provide references in regulations to support the statement that a LMP amendment is not required.

Thank you for the opportunity to object to this project, as it is of great interest and concern to the snowmobiling public and to the economy of our rural communities.

Corky Lazzarino
Executive Director