



Promoting opportunities for quality, human-powered
winter recreation and protecting winter wildlands

March 20, 2015

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Public Affairs Officer
Tahoe National Forest
631 Coyote Street
Nevada City, CA 95959

Re: Scoping Notice: Over-Snow Vehicle Designation -- File Code 1950
February 20, 2015

Dear Sirs:

In this letter we provide the Alternative developed by Snowlands Network and Winter Wildlands Alliance pursuant to the Settlement Agreement referenced in the scoping notice. We request that this Alternative be analyzed as part of the Environmental Impact Statement for the designation of over-snow vehicle use on the Tahoe National Forest

Currently Tahoe National Forest ("TNF") publishes a winter recreation guide that identifies areas that are closed to motorized use in winter, both to protect nonmotorized recreation opportunity and for other purposes. Our Alternative continues these closures. We oppose any opening up of such areas to OSV recreation. We also support the proposed closure to OSVs of the additional areas indicated in the Scoping Notice and include them in our Alternative, including a slightly-expanded Loch Leven closure.

Winter travel planning must protect opportunities for nonmotorized recreation recognizing the experience nonmotorized users seek, and minimize impacts from OSVs on wildlife, the environment, and other uses. Our Alternative is designed to minimize these impacts, especially to nonmotorized recreation, while continuing to allow high quality OSV recreation on the TNF. Additional restrictions may be appropriate and necessary to protect species, watersheds, riparian areas and other ecosystems. We look forward to seeing full analysis of OSV impacts on wildlife, the environment and other existing or proposed recreational uses in the Draft EIS.

Our Alternative allows snowmobile recreation to continue on designated routes as well as unrestricted cross-country snowmobile travel on a substantial portion of TNF lands. It is a win-win for users and the local communities because it will better position the Tahoe National Forest to accommodate growth in winter recreation demand as well as climate change trends that limit and concentrate over-snow recreation opportunity. Thus the Tahoe National Forest will serve the

most users and bring the most winter tourism to local communities in a sustainable manner.

The Alternative that we propose meets the Purpose and Need set forth in the Tahoe's Notice of Intent and is in compliance with Executive Order 11644, the Over-Snow Vehicle Rule, and the Settlement Agreement between the Forest Service and our organizations. However, we believe the Purpose and Need statement should specifically mention the need to preserve accessible opportunities for users to recreate on the national forest in winter free from the noise and other impacts of motorized recreation, rather than just ambiguously refer to "conflicts" between uses. Specifically, we propose that the Purpose and Need for this planning process be amended as follows (addition in bold italics):

Purpose and Need for Action

One purpose of this project is to effectively manage OSV use on the Tahoe National Forest to provide access, ensure that OSV use occurs when there is adequate snow, promote the safety of all users, ***ensure non-motorized recreation opportunities are preserved and enhanced***, enhance public enjoyment, minimize impacts to natural and cultural resources, and minimize conflicts among the various uses.

Currently, approximately 20% of the Tahoe National Forest is closed to OSVs (almost half of which is relatively low-lying Wild and Scenic river canyons). Our Alternative protects approximately 4% more of the forest beyond what is in the Proposed Action specifically for nonmotorized recreation, including areas where OSV travel may continue on designated routes. Overall, our Alternative suggests that approximately 63% of the TNF can be designated as areas open to OSV recreation, pending closer review of environmental impacts and other considerations. This Alternative creates a fair balance of winter recreational opportunity on TNF, taking into account the relative demand for motorized and nonmotorized recreation, the impacts of motorized recreation on nonmotorized users and the environment, and the relative ability of the landscape to sustain growth in motorized use as compared to its ability to sustain growth in nonmotorized use.

In many areas, the primary objective of the Forest Service, and the primary needs of the public, has shifted from resource extraction to recreation. Situated near dense centers of population, this trend is very true for the Tahoe National Forest. The demands of an increasing population require the TNF to reevaluate how to serve such public in a responsible and sustainable manner.

As recently stated by the National Forest Foundation, "Backcountry skiing and snowboarding are some of the fastest growing sectors of the ski industry. Recent advances in snowmobile technology allow riders to get farther into the

backcountry than ever before.”¹ As recently confirmed by the Forest Service, “We can no longer manage as we have in the past.”²

Our Alternative recognizes and deals with these facts and the twin fact that (i) there is substantially greater demand for nonmotorized winter recreation in the TNF than for motorized recreation, as established by Forest Service monitoring data (NVUM) and direct observation³, and (ii) on any single parcel, the TNF can accommodate far more nonmotorized users than motorized users.

The Forest Service planning regulation recognize sustainable recreation as an important objective of the Forest Service.⁴ In order to create a fair balance of winter recreational opportunity that serves the greatest number of users and allows for the most growth in sustainable recreation our Alternative proposes additional areas where OSV travel is restricted to designated routes or is disallowed entirely. The need for these additional nonmotorized areas is discussed in general in our position paper, “Analyzing OSV Impacts to Other Winter Recreation Users,” included in our submission as Exhibit A (“Analyzing Impacts”). The application of these general considerations to specific areas on TNF is discussed below.

The OSV restrictions in our Alternative will also provide enhanced protection to species, habitat, and water quality by increasing the acreage on the TNF that is closed to cross-country OSV travel. We outline wildlife and environmental protections that should complement our proposed non-motorized recreation closures in our position paper, “Wildlife and Environmental Concerns -- Over-Snow-Vehicles In the Tahoe National Forest” included in our submission as Exhibit B (“Wildlife Concerns”).

General principles for effective management of OSVs and the need for such practices (both for preservation of recreational opportunity and for protection of plants, wildlife, and the environment) are discussed in the Winter Wildlands Alliance publication “Snowmobile Best Management Practices for Forest Service Travel Planning” included in our submission as Exhibit C (“BMP Practices”).

We have also included in our submission, via DVD, a file of important literature and science studies that document OSV impacts and the need for restrictions on OSV use. A list of these documents is included as “List of Additional Submitted

¹ “Voices from the Forest,” Your National Forests, the Magazine of the National Forest Foundation, Winter-Spring 2015.

² “A Framework for Sustainable Recreation,” USFS, USDA June 25, 2010.

³ According to the most recent National Visitor Use Monitoring data (2010), the Tahoe National Forest receives approximately five times more cross-country skier visits (247,317) than snowmobiler visits (42,078). Backcountry skiing is generally included in the cross-country skiing category for NVUM surveys.

⁴ 36 CFR 219.8(b)(2).

Documents”, attached as Exhibit D. These are basic to any analysis of OSV impacts.

We refer you to these documents for general support for each element of our Alternative. As discussed throughout these documents, the restrictions outlined in our Alternative are necessary to manage OSVs in accordance with the minimization criteria set forth in Executive Order 11,644 (Executive Order No. 11,644, 37 Fed. Reg. 2877, Feb. 8, 1972, *as amended by* Executive Order No. 11,989, 42 Fed. Reg. 26,959, May 24, 1977) and in accordance with Forest Service principles of Sustainability, Multiple Use and Diversity of Plant and Animal Communities (Multiple-Use Sustained-Yield Act of 1960).

We have included in our submission a map entitled “Winter Recreation Management on the Tahoe National Forest”, attached as Exhibit E. This map displays the specific areas that we have identified as important for non-motorized recreation. Our Alternative proposes that these areas not be open to cross-country OSV travel. Most of the areas have no OSV routes through them and thus would be entirely closed to OSVs. Our map also identifies suggested boundaries of areas that should be designated as open to OSV’s. This designation must take into account sensitive environmental areas, wildlife areas, areas of historical and tribal significance, and other appropriate considerations that we are able to only generally reference in our presentation.

The need to protect large areas for nonmotorized winter recreation in this winter travel management process is of particular urgency in the TNF due to the absence of federally-designated Wilderness in the TNF north of Interstate 80, and the primary importance of such lands to serving the public’s demand for non-motorized winter recreation opportunity.

In the remainder of this letter, we will discuss (A) the 2015 Over-Snow Vehicle Rule, (B) OSV route grooming and trailhead plowing, (C) the need to mitigate impacts from OSV use, (D) new management areas to protect opportunities for nonmotorized recreation, (E) the suggested boundaries of areas to be designated as open to OSV use and (F) best management practices for OSVs to be required across the TNF.

A. The 2015 Over-Snow Vehicle Rule

In late January 2015, the Forest Service’s Washington Office released a new Over-Snow Vehicle Rule providing a framework for winter travel planning efforts on all National Forest lands (80 Fed. Reg. 4500, Jan. 28, 2015, 36 C.F.R. part 212, subpart C). The OSV Rule requires that forests designate routes and areas where OSV use is allowed, publish these designations on an OSV use map, and prohibit any OSV activity that is inconsistent with the published map. This travel planning is to occur under the directives that accompanied the 2005 Travel

Management Rule, although we anticipate that these directives will be amended in light of the new OSV Rule.

The OSV Rule requires national forests with adequate snowfall to designate and display on an “over-snow vehicle use map” specific areas and routes where OSV use is permitted based on resource protection needs and other recreational uses. The Tahoe is the second national forest to undergo winter travel management planning under the new OSV rule. To comply with the rule and get rule implementation off to a good start it is critical that the TNF’s OSV plan satisfies the Forest Service’s substantive legal duty to locate areas and trails designated as open to OSV use to *minimize* resource damage and conflicts with other uses.

The TNF is obligated to comply with the minimization criteria outlined in Executive Order No. 11,644, 37 Fed. Reg. 2877 (Feb. 8, 1972), *as amended by* Executive Order No. 11,989, 42 Fed. Reg. 26,959 (May 24, 1977). These criteria are as follows: 1) minimize damage to soil, watershed, vegetation, or other resources of the public lands; 2) minimize harassment of wildlife or significant disruption of wildlife habitats; and 3) minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands. The executive orders require the Forest Service to *minimize* impacts – not just identify or consider them – when designating areas or trails for OSV use, and to demonstrate in the administrative record how it did so. Therefore, the Forest Service must show not just that impacts have been studied, but specifically demonstrate how effective each of the Alternatives presented in the DEIS is in minimizing impacts from OSVs. As one of the first forests to implement the new OSV rule, it is critical that the Tahoe properly apply the minimization criteria.

To meet these minimization criteria the TNF must follow the process for travel management planning as outlined in Chapter 10.3 of Forest Service Handbook 7709.55. This six-step process includes: “(1) compiling existing travel management direction; (2) assembling resource and social data; (3) using travel analysis to identify proposals for change; (4) conducting appropriate environmental analysis and decision-making; (5) identifying designated routes and areas on an MVUM [or OSVUM in this case]; and (6) implementing, monitoring, and revising.” Step 3, travel analysis, is the critical point where broad-scale issues are identified and thus forms the basis for proposed actions related to travel planning. We believe that the TNF should not have proposed travel management designations in its scoping notice without having completed this travel analysis. We ask that the TNF comply with all 6 steps in the travel planning directives.

Under the OSV Rule, areas open for cross-country snowmobile travel must be smaller than a ranger district and areas that are not specifically designated as open are closed to OSV use. The proposed action put forth by the TNF does not abide by the letter or spirit of this rule. The proposed action fails to designate areas that are “discrete,” “specifically delineated,” and “smaller . . . than a ranger district.”

(definition of an “area” in 36 C.F.R. § 212.1). Rather than identify and delineate discrete open areas that are smaller than the forest’s three ranger districts, the scoping notice suggested that the TNF proposes to designate as open everywhere that is not designated closed. Moreover, proper application of the executive order “minimization criteria” almost certainly would not result in designation of open areas even close to the size of a ranger district given the significant adverse impacts of cross-country OSV travel to sensitive wildlife, nonmotorized users, and other uses and resources.

We hope that the Preferred Alternative identified in the draft Environmental Impact Statement draws heavily from our proposal.

B. OSV Route Grooming and Trailhead Plowing

As required under the Settlement Agreement, the TNF is required to “identify snow trails for grooming” and analyze “a range of alternative actions that would result in varying levels of snowmobile use,” taking into account the impact of activities “such as the plowing of related parking lots and trailheads”. Amended Settlement Agreement, *Snowlands Network v. U.S. Forest Serv.*, 2012 WL 4755161 (2012) (No. 2:11-cv-002921).

A major consequence of OSV route grooming and trailhead plowing is to increase the general level of OSV traffic and usage in the national forest. In its environmental analysis of the OSV grooming program, the State assumed that the program approximately triples snowmobile activity in the groomed areas. (DEIR p 2-20) The manner in which such use affects and displaces nonmotorized use and impacts wildlife is discussed in our position papers that are included with this comment letter (see “Analyzing Impacts,” “Wildlife Concerns,” “BMP Practices” and Exhibit D).

Our Alternative does not call for the cessation of grooming on any existing groomed OSV route or for the cessation of plowing of any OSV trailhead. (Our Alternative does include a very limited restriction on the OSV route on the Gold Lakes highway.) With restrictions on OSV use in other areas, there is adequate room on TNF to provide a fair balance of recreational opportunity without ending the grooming of OSV routes and plowing of OSV trailheads. The additional closures and restrictions we propose in our Alternative serve as mitigation of the consequences of grooming OSV routes and plowing OSV trailheads by establishing nonmotorized areas where recreation users seeking clean and quiet areas can readily avoid the impact of the State’s OSV grooming program.

The popular Gold Lakes highway provides excellent winter recreation opportunity. Skiers currently are displaced from this area due to the presence of large numbers of snowmobiles. We believe this highway can be made more attractive to nonmotorized users with minimal impact on responsible OSV travel

and thereby significantly enhance nonmotorized recreation opportunity through the very limited restrictions proposed in our Alternative.

Additional restrictions and other mitigation measures may be necessary beyond those provided by our suggested Alternative to protect species, watersheds, riparian areas and other ecosystems. Appropriate mitigation measures for the various impacts of OSVs on other forest uses, wildlife, and the environment should be spelled out in the Draft EIS. With the minimization criteria in mind, we expect that the designated OSV use areas set forth in the Preferred Alternative will be smaller than the entirety of those lands that lie outside of our Important Non-Motorized Recreation Areas. We have included on our map suggested boundaries for designation of OSV areas, subject to further review of sensitive environmental areas, wildlife areas, areas of historical and tribal significance, and other appropriate considerations that we are able to only generally reference in our presentation.

C. The Need to Mitigate Impacts from OSV Use

In proposing this Alternative, we have assumed that the Forest Service acknowledges the need for mitigation of OSV impacts due to the noise, emissions and other impacts of OSVs that are discussed in our submitted and referenced documents, as well as the stimulation of OSV use caused by the Forest Service's participation in the State of California's OSV trail grooming program. The TNF should, to the extent practicable, rely on relevant past scientific studies of OSV impacts such as noise, pollution, and user experiences so that it does not need to duplicate efforts in this EIS. We believe these impacts have been well-established in prior government studies, including, for instance, in Yellowstone National Park, as well as the numerous scientific studies referenced in our submitted documents. Certain impacts – such as noise and the smell of toxic exhaust, are obvious from personal observation, and their impact on other users is subjective and well-established by user comments (see, for instance, the file of comments included in Exhibit D.)

In order to manage OSVs in a manner that meets the minimization criteria, the Forest Service must collect reliable data on OSV impacts. Regardless of the Alternative selected for the final plan, we suggest, among other analyses, that the Forest Service measure the ambient air pollution in recreation areas with heavy snowmobile traffic (both trailheads and routes), the distance snowmobile noise travels through popular recreation areas and the relative capacity of powder-covered slopes to serve motorized and nonmotorized users (by measuring the relative number of users that can obtain their desired recreation experience on one slope (a) if it is open to motorized travel and (b) if it is closed to motorized travel). This data can help determine the impact of motorized use on users desiring clean and quiet recreation.

D. New Management Areas

The map submitted with our Alternative identifies ten areas proposed for new restrictions on motorized use to preserve and enhance nonmotorized recreation opportunity. We understand that the Tahoe's winter travel management plan will designate areas for motorized use, rather than areas that are specifically managed for nonmotorized use. However, our expertise and knowledge is of the areas on the Tahoe that are valuable for nonmotorized recreation, therefore, we have focused our efforts on identifying these areas. We are separately submitting a GIS shapefile of these areas in order to facilitate analysis of this Alternative during the EIS process.

Recognizing differing objectives of the three basic types of ski recreation discussed in our document "Analyzing Impacts," we have classified our proposed areas into three types:

"Front-country nonmotorized" areas protect nonmotorized recreation opportunity in areas that are easily accessed from plowed trailheads and roads and have a high degree of nonmotorized use. Restriction of OSVs is necessary to eliminate the noise, toxic exhaust, disproportionate consumption of powder snow, trail rutting, and other OSV impacts.

"Backcountry solitude" areas protect large areas for a quiet and remote recreation experience in winter. These areas also protect sensitive species that thrive only in relatively large areas with minimal human activity.

"Managed shared use" areas restrict OSV usage so that there can be meaningful shared use of easily-accessible and popular areas. Meaningful shared use is made possible by restricting OSVs to designated routes, establishing separate trailheads, restricting OSVs to cleaner and quieter machines, imposing speed limits on shared-use trails, and other management tools. Methods for managing shared use are explained and discussed in the documents "Analyzing Impacts" and "BMP Practices".

The proposed areas are:

Andesite, Summit Lake, Devil's Oven, Coon Canyon and PCT/Grubb. These four areas all surround and enhance the existing OSV closure area on the west side of Castle Peak. They are necessary and appropriate due to the high level of winter recreation demand in this area.

These areas are primarily served through the trailhead at Donner Summit. Our Alternative restricts this trailhead to nonmotorized use only. Given its location at the summit of the major interstate highway crossing the Sierra Nevada, this trailhead location has one of the highest levels of nonmotorized user demand in California. Because of the relative impacts of motorized and nonmotorized use,

the trailhead and the designated areas should be restricted to nonmotorized use in order to serve the greatest number of users.

The closed area is surrounded by extensive terrain that our Alternative leaves open to motorized use and that can be readily accessed by OSVs. Thus, our Alternative restricts motorized use on the lands that can be readily reached by nonmotorized users, while leaving open to OSV use lands farther from trailheads that can be readily accessed only by motorized users. To the extent an alternate trailhead needs to be established to allow motorized users to access the open lands, we suggest that the TNF seek funds from the State of California's OSV program in order to establish such trailhead in a nearby area open to motorized use. There are several possible locations for such trailhead.

Specific reasons for each area closure are discussed below.

Andesite Ridge and Summit Lake. Classification: front-country nonmotorized. These areas are immediately adjacent to the trailhead and thus are some of the most accessible winter recreation lands in the Sierra. They already have a high-level of nonmotorized use. Although motorized use may be infrequent in these areas, a single OSV can significantly disrupt the recreation experience sought by multiple nonmotorized users.

PCT/Grubb. Classification: backcountry solitude. This area is just beyond the Peter Grubb hut and is frequently used by nonmotorized users seeking backcountry solitude when staying at the hut. The Pacific Crest Trail runs through it and is legally established as a nonmotorized trail. Although motorized use may be infrequent in this area, a single OSV can significantly disrupt the recreation experience sought by multiple nonmotorized users.

Devil's Oven. Classification: front-country nonmotorized/backcountry solitude. This area provides a backcountry alpine ski experience that is readily accessible for strong day users and yet has a remote, backcountry setting. The steep alpine slopes, suitable for the alpine adventure activity, can provide several days of backcountry skiing/snowboarding for multiple users, or can be shredded⁵ in an hour by a single OSV. This area had provided alpine adventure in a remote backcountry setting for many years, but with the advent of more powerful OSVs, concentration of use due to global warming trends, and general increases in demand for winter backcountry recreation, backcountry skiers and snowboarders find the slopes shredded far more quickly, and by far fewer users, than would be the case in the absence of motorized use.

⁵ Shredding is a colloquial term used with regard to winter recreation. As used herein, it refers to the multiple tracking of terrain covered with recent snow, which multiple tracking changes the surface and significantly downgrades the recreation experience sought by many users. As described in "OSV Impacts", untracked snow is a resource precious to the Alpine Adventure form of recreation.

Coon Canyon. Classification: front-country nonmotorized. This area currently is used by OSVs. Closure of the area is appropriate, in addition to the other closures noted above, to allow easier enforcement against trespass and to allow for sustainable growth in nonmotorized winter recreation.

Other proposed closure areas are:

Donner South. Classification: front-country nonmotorized. This area receives substantial use by skiers, snowshoers and snowboarders. It is easily accessed, including from Sugarbowl Ski Resort, and also includes the Pacific Crest Trail. The area is near both the Benson and Bradley ski huts. Although motorized use may be infrequent in these areas, a single OSV can significantly disrupt the recreation experience sought by multiple nonmotorized users.

Sardine Lakes. Classification: front-country nonmotorized. This area in the southern Lakes Basin is accessed using the Gold Lakes Highway. It is popular with nonmotorized users because of the scenic beauty and the relatively easy access. It provides terrain for touring, backcountry exploring and alpine adventure (all three of the principal nonmotorized activities.) It should be nonmotorized in order for nonmotorized users to achieve a clean and quiet recreation experience in the southern Lakes Basin.

Lunch Creek East. Classification: front-country nonmotorized. This area adjoins the existing Lunch Creek ski area, which is closed to OSVs. The ski trails in the existing Lunch Creek area cross an OSV route and continue on the other side of the route. Our Alternative closes this “far” side of the OSV route to cross-country OSV travel, in order to protect a nonmotorized experience on the full ski trail, consistent with keeping the designated OSV route open. Our Alternative does not close any groomed or ungroomed OSV routes in this area, but closes a small area only to cross-country OSV travel in order to enhance nonmotorized recreation opportunity.

Prosser – Boca. Classification: Managed shared use. This area on the east side of the forest close to Reno, Truckee and other communities along Interstate 80 should be managed for shared use. This change is not mandated by current conflicts, but is intended to better manage and channel future growth. The area is at a lower elevation than our other areas and thus more susceptible to global warming trends.

Our Alternative proposes that OSVs in this area be limited to travel on the designated roads. Cross-country travel off of these roads would be prohibited. This restriction creates opportunity for the “Backcountry Exploring” type of nonmotorized activity, while restricting the “Backcountry Exploring” type of snowmobile activity. This is appropriate because OSV riders desiring to engage in the Backcountry Exploring type of activity can travel much farther than nonmotorized users and thus readily access areas that provide a higher quality of

backcountry experience. Nonmotorized users cannot travel so far and thus must “make do” with what is readily accessed from plowed trailheads.

In addition, we believe that OSV usage in this area should be restricted only to snowmobiles employing “best available technology,” meaning those with cleaner and quieter engines. We believe a mandatory BAT requirement is appropriate and should be phased in at managed shared use areas. However, due to the relatively low current use in this area, we understand that the Forest may initially strongly prefer to set a voluntary BAT restriction. Our Alternative provides that, in this managed shared use area, BAT compliance is expected, though noncompliance is not subject to a fine or citation. Our Alternative contains a commitment to reconsider this voluntary compliance program every five years, the objective being to maximize shared use in this area. Due to the scale of impact of just one dirty machine, as more users transition to cleaner and quieter machines, there will be greater justification for imposing a mandatory requirement.

In addition to the new area closures described above, our Alternative includes a limited motorized restriction on the **Gold Lakes Highway**. The Gold Lakes highway is a highly scenic road. It has extensive OSV use but relatively little nonmotorized use despite its scenic touring potential. The presence of extensive OSV traffic has displaced nonmotorized use of this roadway.

The Gold Lakes highway contains essential attributes (width, grade, and route) that make it an excellent ski and snowshoe route (as well as a motorized route) *regardless of whether it is groomed*. The fact that it is groomed for OSV recreation brings many OSV users to the area, and the extent of such use displaces nonmotorized users. The limited restrictions described below are important to mitigate the impacts of the grooming program. It is acceptable for grooming to be discontinued on this route, but we do not object to such grooming being continued so long as the impacts of such grooming are mitigated. Our purpose is not to allow skiers and snowshoers to more readily piggyback on the State’s OSV grooming program, but to allow skiers and snowshoers a better recreational opportunity on a route that is attractive to them regardless of whether it is groomed. In other areas with unplowed and ungroomed roads, Nordic striding skiers, in particular, readily “groom” their own trails. Snowshoers can also readily follow snowshoe tracks without grooming. Many popular winter nonmotorized recreation areas have no groomed trails at all.

The Gold Lakes highway presents a situation where a compromise solution needs to be reached in order to foster nonmotorized recreation while recognizing the route’s long-standing importance to the OSV community. Accordingly, we have considered all the techniques listed above with regard to managing areas for shared use. We believe that the minimum restriction that should be applied in this area is limiting OSV use on weekends to OSVs that meet best-available-technology standards with regard to noise and emissions. Such restriction will be

welcomed by some OSV users who have cleaner and quieter machines. Users with older machines that create excessive noise and pollution will still be able to ride on the Gold Lakes highway on weekdays (including non-weekend holidays) and on weekends such users have hundreds of miles of other groomed routes to ride that are readily accessible from nearby trailheads.

Such a restriction has worked to reduce motorized/nonmotorized user conflicts substantially in Yellowstone National Park. Such a restriction also is required of some outfitter-guides permitted by the Forest Service in the Sierra Nevada. This restriction substantially enhances opportunity for all types of nonmotorized activity while impacting only OSV riders with older, more polluting machines. Although such older machines current predominate in the Sierra Nevada, there is a trend for OSV riders engaging in the Trail Touring activity to transition to the cleaner and quieter vehicles. This trend should be actively encouraged by the Forest Service. The new travel management rule specifically authorizes designation of restrictions by class of vehicle or time of year (36 CFR 212.81(a)).

We believe the Golds Lakes highway, as well as lands within the Lake Tahoe basin (managed by the Lake Tahoe Basin Management Unit), are the appropriate areas for Region 5 of the Forest Service to introduce mandatory BAT requirements.

In addition to the above, our Alternative provides for the trailhead immediately adjacent to the **Kyburz** area to be restricted to nonmotorized use only. This reflects the majority of current use at the area, and motorized users will still be able to stage and access this area from the nearby Little Truckee Summit trailhead, where there are almost no nonmotorized users due to the heavy and consistent presence of OSVs.

Pacific Crest Trail

The Pacific Crest Trail should be managed to provide a nonmotorized winter experience for users. Snowmobiling must not be allowed on or along any section of the PCT, as stated in the “Comprehensive Management Plan for the Pacific Crest National Scenic Trail” (USDA Forest Service, January 18, 1982). As further set forth in that document, “any motorized use of adjacent land should be zoned to mitigate the noise of conflict.”

We support the TNF’s proposal to manage the PCT as a non-motorized trail. In order to reduce impacts on this Congressionally designated National Scenic Trail we propose that the TNF establish limited OSV crossing zones along the PCT. These crossings should be marked on winter travel maps and utilize already established roads and routes. The number of crossing points should be sufficient to allow access by OSVs to lands on both sides of the PCT but small enough that the OSV community will respect the nonmotorized nature of the PCT. The PCT, nonmotorized lands around it, and designated crossing points should be clearly

marked on TNF winter recreation guides. In addition, to reduce OSV trespass from those small sections where the PCT follows a road and is co-designated as an OSV route, we suggest that the TNF clearly sign where the non-motorized trail resumes.

Snow Play Areas

In addition to the above, TNF should designate appropriate areas for snow play. Designation of snow play areas allows for concentration of use in areas that are appropriate for snow play and that have adequate parking. Such areas and their primary access routes should be closed to OSV traffic for safety and other reasons.

E. Suggested Boundaries for Designated OSV Areas

We have included on our map suggested boundaries of the areas that the TNF might designate as open to OSV use. Such boundaries encompass all currently designated OSV routes and most of the popular off-trail OSV riding areas. There are significant additional lands, not marked on our map, that provide significant OSV recreation opportunity and will continue to be open to OSV use as permitted by the landowner. We have not marked such areas because the Forest Service does not manage them. Although much of these lands are generally open to OSV use, where the landowner wishes to exclude motorized use of his land, such desire must be respected. The TNF winter recreation guides must alert OSV riders of the need to respect private landholdings.

The suggested open area north of Cisco Grove is quite large. In order to preserve habitat and some lands in this ecosystem where Wilderness-type values are preserved, we have excluded from this area an area that has no OSV trails and where Wilderness-type values predominate in winter. As with the delineation of the boundaries of the open areas, our map contains a suggestion that should be evaluated and refigured, if appropriate, based on a more thorough analysis.

F. General Best Management Practices

Nonmotorized trailheads should be established and designated to access nonmotorized areas. The TNF already uses this management practice, and its use should be continued and extended where feasible, in particular at areas such as Bassetts where meaningful shared use is encouraged. The TNF should set a goal of establishing separate trailheads for nonmotorized use at popular shared use areas. In some locations, this expectation could be satisfied by prohibiting snowmobiles from a designated portion of a single trailhead location.

BAT - Transition of users to cleaner and quieter OSVs should be encouraged throughout the TNF. The Tahoe should adopt policies that promote the use of

cleaner and quieter snowmobiles. In addition to restrictions on the Gold Lakes highway and the Prosser/Boca shared use area, our Alternative includes a Forest Service commitment to reconsider the imposition of Forest-wide BAT standards every five years. Due to the scale of impact of just one dirty machine, as more users transition to cleaner and quieter machines, there will be greater justification for imposing a mandatory requirement.

We believe that the BAT standards adopted by Yellowstone National Park after extensive debate and consideration are reasonable. We believe for bureaucratic efficiency these published standards should be the starting place for a BAT standard applicable on TNF. We believe modifications to the Yellowstone BAT standard as applied to TNF should be considered at the regional level of the Forest Service.

Monitoring adaptive management, and enforcement should be established as recommended in our document “BMP Practices.”

Minimum snow depths should be 18 inches for cross-country travel and for grooming of OSV trails.

Although we understand the rationale for creating a new limit of 6 inches for OSV travel on designated routes with underlying roads and trails, we believe such a relaxed rule will create more complex enforcement issues and will result in greater destruction of riparian and meadow areas which are traversed or bordered by such routes. To the extent a relaxation of the minimum snow depth rule is appropriate with regard to a specific route in order to allow OSVs to access higher terrain and legal snow levels, such restriction should be considered on a limited basis where it can be readily enforced and directly serves such purpose, perhaps by designation of a limited number of low-snow access routes.

There already are enforcement issues with regard to areas that have a 12 inch minimum requirement. Snowfalls are uneven, and the same general area may have little to no snow cover in some places and extensive snow cover in others. In low snow years such as the current season, OSVs pushing the limits have caused damage in sensitive areas. Measuring snow depths is often subjective and currently left to user discretion. Accordingly, the TNF should increase the minimum snow depth for cross-country travel to 18 inches to improve compliance and enforcement of responsible OSV usage

At the scoping meetings a number of individuals expressed concern about how the TNF would determine when minimum snow depth was achieved and trails or areas were open. We suggest that the TNF follow the example of other National Forests with minimum snow depth requirements. On these forests official snow depth measurements are taken by US Forest Service personnel until the snowpack is at sufficient depth. Measurements are available at District offices and it is the user’s responsibility to check and see whether the snow is deep enough to allow

OSV use. On forests where the snow pack varies throughout the winter season additional measurements occur as conditions warrant.⁶ We also suggest implementing seasonal “bookends” before and after which OSV activity is not allowed regardless of snow depth.

We object to the TNF simply referring to State standards with regard to minimum snow depths for grooming and for travel on the groomed routes. To the extent the State of California wants to apply a more stringent limit than 12 inches for general OSV use or 18 inches for grooming activity, that is acceptable. However, the TNF should not defer to State thresholds when they are below the minimums the TNF considers appropriate.

Nordic Grooming. Our Alternative contains an expectation that grooming of trails for skier use will be encouraged through cooperative arrangements with third parties and that more trails will be groomed for skier use. Such grooming can be done with light equipment that can have impact similar to riding a trail with a single snowmobile. The facilitation of more Nordic trail grooming can significantly encourage Nordic tourism for the benefit of local communities, as well as serving local residents.

Homeowner Access. Our Alternative is intended to preserve the ability of homeowners to access cabins and lots by snowmobile or other OSV and accepts the creation of additional designated routes where necessary to provide such access.

Additional Trail Conflicts. Conflicts sometimes arise through shared use of trails by skiers, snowshoers, dogs or, more recently, “fat bikes.” Many of these conflicts can be minimized through educating users on shared use principles: having snowshoers and fat bikes stay off ski tracks and ski trails groomed for skate skiing and having owners clean up after their dogs. These responsible practices should be highlighted in the TNF’s winter recreation guide. Trail restrictions or separations may be warranted in certain areas and should be addressed through further collaborative efforts involving local community groups.

⁶ See for example, Tongass NF MVUMs: <http://www.fs.usda.gov/detail/tongass/maps-pubs/?cid=stelprdb5430063>. Emergency closures due to low snow conditions can be communicated via online media channels, as with this example from the Chugach NF: http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5441982.pdf

Our Alternative creates a fair balance of recreational opportunity, using restrictions tailored to particular situations. We hope and ask that it be incorporated into the DEIS Preferred Alternative.

Sincerely,

SNOWLANDS NETWORK

A handwritten signature in black ink that reads "Bob Rowen". The signature is fluid and cursive, with a long horizontal stroke at the end.

Bob Rowen
Chairman and VP - Advocacy
browen@snowlands.org

WINTER WILDLANDS ALLIANCE

A handwritten signature in black ink that reads "Hilary Eisen". The signature is cursive and somewhat stylized, with a large initial "H" and a long horizontal stroke.

Hilary Eisen
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