

OVER SNOW MANAGEMENT PROPOSALS AND POTENTIAL IMPACT MINIMIZATION STRATEGIES

BACKGROUND AND PROCESS OVERVIEW

Between late September and late December 2022, representatives from the entities listed below met both in facilitated meetings and limited site visits to develop stakeholder-based recommendations that balance over-snow vehicle (OSV) travel, various forms of winter recreation, and minimization of potential impacts to forest natural and cultural resources, sensitive habitats, and all visitors on lands managed by the Inyo National Forest. See Attachment 1, “Collaborative Alternative Team Process,” for an overview of the meeting process and schedule.

Representatives from the following organizations and communities participated with a core group of approximately twenty individuals attending all four meetings:

- Bishop Paiute Tribe
- Blue Ribbon Coalition
- Boulder Lodge
- California Off-Road Vehicle Association
- Community Members from Town of Mammoth Lakes
- Community Members from around June Lake
- Friends of the Inyo
- Mammoth Lakes Recreation
- Mammoth Lakes Trails and Public Access Foundation
- Mammoth Mtn Ski Area
- Mono County
- Nevada Off-Road Association
- Pacific Crest Trail Association
- Sierra Snowmobile Foundation
- Town of Mammoth Lakes
- Valley Outdoors
- Winter Wildlands Alliance

Participating individuals affirmed their commitment to work together as a “Collaborative Alternative Team” in the pursuit of developing proposals to minimize conflict between different forms of recreation and between recreation of all types and the environment (see Attachment 2, “Collaborative Alternative Team Charter and Participant Commitments”). Participants agreed that by coming together to talk before the formal National Environmental Policy Act (NEPA) process was initiated and providing information and sharing ideas for how to creatively address concerns could result in productive dialogue and, ultimately, implementable proposals.

The memorandum and the accompanying table (Attachment 3) is the end-product of this process and is presented to the Inyo National Forest Supervisor for review and consideration as the Inyo National Forest proceeds with undertaking its formal planning process in compliance with the Travel Management Rule, NEPA, and relevant National Forest rules and regulations.

PROPOSALS & POTENTIAL IMPACT MITIGATION STRATEGIES DEVELOPMENT

After an explanation of the United States Forest Service Travel Management Rule requirements and the steps previously taken to initiate formal OSV planning on the Inyo National Forest, participants were asked to discuss current and desired OSV access use and issues across the entire Inyo National Forest starting in the north and progressing south. Over the course of three in-person meetings, site visits at four locations¹ and one final virtual meeting, participants developed and discussed over thirty different locations across the Inyo National Forest.

The facilitator² worked with the Inyo National Forest planner to document the discussions and to reference specific reviewed areas on base maps that were made publicly available. After iterative rounds of proposal generation and review, the facilitator created a worksheet listing all generated ideas and had the Inyo National Forest Staff add potential issues for each proposal that would need to be mitigated before being considered as part of a formal NEPA proposed action. Then, the worksheet was distributed after the last meeting, and all participants were asked to individually identify any additional concerns not already identified by the Inyo National Forest staff that they believe need to be considered while developing the proposed action. Participants were specifically asked to provide details regarding what their issue is in terms of:

- Resources: Damage to soil, watershed, vegetation, and other forest resources.
- Wildlife/Habitat: Harassment of wildlife and significant disruption of wildlife habitats.
- Use Conflicts: Conflicts between motor vehicle use and existing or proposed recreational uses and conflicts among different classes of motor vehicle uses of National Forest System lands or neighboring Federal lands. Compatibility of motor vehicle use with existing conditions in populated areas, considering sound, emissions, and other factors.

¹ Site tours were attended by a subset of participants on October 4 to visit the Mammoth Mountain Ski Area Main Lodge parking lot, the Earthquake Fault Visitor Parking Area and the Cinder Shed along Highway 203 and on October 25 to visit Shady Rest Park.

² The facilitator is an employee of the California State University Sacramento Department of Continuing Education and was under contract to the US Forest Service Pacific Southwest Region.

Completed worksheets were returned from nearly all participating organizations³ and then the facilitator and the Inyo National Forest project planner consolidated all generated potential issues and suggestions for addressing potential issues into a second iteration of the worksheet that was then distributed back out to all participants for their consideration.

Participants were asked to review the collected input from their peers and to add any new potential management techniques and strategies to reduce potential impacts or conflicts resulting from OSV use in the areas under discussion. After an extended nearly month-long review period, completed worksheets⁴ were consolidated, and the results are shared in Attachment 3. The following thirty-six specific locations as well as a few forest-wide concepts were discussed (Note: the reference numbers below correspond to the item numbers in Attachment 3 to help those interested in learning more about any particular location quickly identify the details in the attached table).

1. Hartley Springs/Obsidian Dome Nordic ski area and surrounding closure
2. Sand flat south of Wilson Butte
3. Saddlebag Lake/ Tioga Pass area
4. Parker Bench
5. Silver Lake Resort and the Hwy 158 area when closed due to snow
6. South side of Mono Lake
7. Currently closed area east of White Wing Mtn. in Upper Deadman area
8. Cherry stem on Deadman Creek – currently closed to OSV use
9. Closed area right by MCWD private land
10. Linkage between Shady Rest and Sherwin areas
11. Rock Creek
12. Crater Flats
13. Ancient Bristlecone Pine Forest/White Mountains
14. Reds Meadow area
15. Closed areas at Minaret Vista
16. Cinder Shed Parking
17. Snow play/sledding areas along the scenic loop, near intersection with Hwy 203
18. Earthquake Fault Parking
19. Earthquake Fault/Dry Creek area that is currently closed to OSV use
20. Kennedy Meadows
21. Woolly's permit area
22. Lakes Basin Tamarack
23. June Mountain Ski Area

³ The initial worksheets were submitted by: Blue Ribbon Coalition, Friends of the Inyo, Mammoth Lakes Recreation, Mammoth Mtn Ski Area, Pacific Crest Trail Ass, Residents of the Town of Mammoth Lakes, Sierra Snowmobile Foundation, Town of Mammoth Lakes, and Winter Wildlands Alliance.

⁴ The second iteration of the worksheet was submitted by: Town of Mammoth Lakes and the Mammoth Lakes Trails and Public Access Foundation.

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| 24. OSV parking area at F-trail near intersection of new road accessing Parcel A | 31. Snow Play area at Deadman |
| 25. Inyo Crater Trailhead | 32. West Portal overlook |
| 26. Panorama Dome | 33. Highway 203 between winter closure and Minaret Vista |
| 27. Shady Rest Park | 34. Wheeler Crest |
| 28. Solitude Canyon/ Sherwins area | 35. Boy Scout Camp access road off Highway 120 |
| 29. June Lake Junction | 36. Lundy Lake\ Canyon |
| 30. Bald Mountain Road (east of Hwy 395) | 37. Forest-Wide |

The organizations and individuals who participated in this effort hope the Inyo National Forest will seriously consider the outcomes resulting from this work as the NEPA process for OSV Travel Management on the Inyo National Forest begins.

REFLECTIONS AND FEEDACK ON PROCESS AND OUTCOMES

This was a challenging process. To begin, several of the invited parties have long histories of opposing one another on similar projects concerning motorized access on publicly managed lands. These same parties have made formal objections to OSV decisions on other National Forests in California and several of the parties are currently engaged in a legal challenge on the Stanislaus National Forest’s OSV proposed management plan. The level of trust between some parties is quite low and with no snow on the ground when this effort was undertaken, site visits were challenging as it was hard to visualize the situation for over-snow recreation. Tension amongst OSV enthusiasts in the community were high as their perception is that the OSV management effort will result in reduced legal access for snowmobiles. Moreover, unresolved questions and challenges with past projects in the planning area have increased tension between many parties. Of particular concern are long-standing issues concerning design and management of public access at Shady Rest Park and in the Sherwins and Solitude Canyon areas.

However, within this context, the facilitator held many phone calls between meetings with various participants and encouraged their continued involvement and outreach to their respective constituents to bring proposals and feedback to the discussions. By conducting site visits and creating a productive meeting environment in which all parties were able to respectfully share ideas and concerns, proposals were generated and discussed. In the end, the Town of Mammoth Lakes representative observed, “Overall process generated some good discussions and identified a few areas of mutual agreement.”

With this said, many of the comments on various proposals detailed in Attachment 3 simply reflect the “position” or opinion of the commentor and may not be grounded in known facts or

legal findings. In conversations with a few of the participants as they reviewed the second iteration of the proposal worksheet, it became clear that many were frustrated by the “unfounded” and/or “unsubstantiated” comments that they saw in response to many of the proposals. Accusations that allowing OSV access in some areas would promote incursions into Federally designated Wilderness areas and generalized statements about perceived motorized aggression made it challenging for some to continue to engage in the effort as they did not want to get into “back-and-forth” arguments. Some participants further requested that the facilitator “scrub” the language in Attachment 3 to remove certain statements that they perceived to be unjustly accusing OSV enthusiasts of illegal behavior unless sufficient documentation could be provided. This was not done, and Attachment 3 was left unedited to provide the Inyo National Forest the “raw” results of the process.

While there was wide disagreement on the extent of OSV access that should be allowed, most participants do agree that there is a need for the Inyo National Forest to make credible representations for their capacity and willingness to provide management, outreach, interpretive, regulatory, grooming, enforcement, and a myriad of related capacities on behalf of the final OSV plan when it is developed. The success of the OSV plan’s implementation will be largely dependent on the National Forest’s capacity to deliver on its obligations and the community’s willingness to collaborate to make sustainable decisions that both protect the environment and serve the needs of responsible recreationists. Participants in this process want the Forest Service to be transparent and straightforward with the public on its abilities to perform in support of implementation and monitoring of the plan. According to one participant, “Sustainable Recreation, and the National Forest’s reliance on partners, should be acknowledged as a strategy for implementation, and the National Forest should make it clear as to their willingness to work with partners for success.” Another participant, Michael Lueders provided a letter (Attachment 4) to detail his final thoughts concerning the effort.

Ultimately, the NEPA process will need to work through the conflicting comments and concerns identified thru this process, and it is hoped that the range of proposals that this effort generated will be of utility to the Inyo National Forest as they undertake their formal OSV planning process. Also, looking forward, for collaboration on issues as contentious as this, more face-to-face time in the field closely looking at the “real-world” conditions is necessary if implementable recommendations are to be developed.

LIST OF ATTACHMENTS

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| Attachment 1: | Collaborative Alternative Team Process |
| Attachment 2: | Collaborative Alternative Team Charter and Participant Commitments |
| Attachment 3: | OSV Management Proposals and Minimization Suggestions Table |
| Attachment 4: | Letter from Participant Michael Lueders, Valley Outdoors |

ATTACHMENT 1

Inyo National Forest Over-Snow Vehicle Travel Management Collaborative Alternative Team Process

To support the efforts of the Inyo National Forest Over-Snow Vehicle Travel Management Collaborative Alternative Team (CAT), the Town of Mammoth Lakes has offered free space for meetings and a facilitator is being provided from the California State University, Sacramento, College of Continuing Education, Consensus and Collaboration Program (CCP). The following proposed meeting process will be reviewed and discussed at the first meeting.

Pre-Meeting #1 Work

1. Share and review relevant documents from user groups to help inform and guide conversations
2. Review base maps to begin identifying areas of concern and areas of opportunity
3. Develop list of topics of interest
4. Consider why Inyo National Forest is important to you and be willing to share at meeting
5. Review draft charter and process
6. Review letter from Inyo NF Supervisor detailing pertinent regulations, sideboards and intent
7. Develop and bring list of technical questions to first meeting

Meeting #1 (September 20, 2022): In-Person (Mammoth Lakes, CA)

1. Overview and Introductions – why convene dialogue and participants to share why they are here
2. Charter Review: how does the dialogue work and what are participant's responsibilities
3. Planning Process: what this dialogue is and isn't and how it relates to the NEPA process
4. Organizational Perspectives: each participant to briefly share what is important to them and where they see opportunities and constraints on Inyo NF
5. What's Next: identification of 2-3 participants to help between meetings and review of between meeting work

Between Meeting Work

1. Each participant to create map showing their identified opportunities and constraints on Inyo NF
2. Develop list of participant's identified interests and concerns
3. Possible site visit(s)

Meeting #2 (October 4, 2022): In-Person (Mammoth Lakes, CA)

1. Sharing of participant maps showing Areas of OSV Opportunity and Areas of OSV Concern
2. Minimization Criteria discussion. Ideas for how to minimize the following:
 - a. Damage to soil, watershed, vegetation, and other forest resources;
 - b. Harassment of wildlife and significant disruption of wildlife habitats;

- c. Conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands or neighboring Federal lands; and
 - d. Conflicts among different classes of motor vehicle uses of National Forest System lands or neighboring Federal lands.
3. Identification of possible site tour location(s)
 4. Review of between meeting work

Between Meeting Work

1. Provide summary from Meeting #2 and share online survey to gauge level of agreement/disagreement on topics
2. Possible site visit(s)

Meeting #3 (October 25, 2022): In-Person (Mammoth Lakes, CA)

1. Education: Ideas for how best to educate and inform visitors to Inyo NF on final OSV decision
2. Enforcement: Recommended strategies and techniques to ensure compliance with OSV decision
3. Evaluation: How should final decision be monitored and evaluated going forward? What is recourse if minimization criteria are not adequately working?
4. Which topics require additional discussion?
5. Review of between meeting work

Between Meeting Work

1. Provide summary from Meeting #3 and share online survey to gauge level of agreement/disagreement on topics
2. Possible site visit(s)

Meeting #4 (November 17, 2022): Virtual

1. Review of which topics are in agreement / disagreement
2. Agreement of what is presented to Inyo NF
3. Next steps / Timeline for Inyo NF formal NEPA planning process
4. Thanks for contributing

ATTACHMENT 2

Inyo National Forest Over-Snow Vehicle Travel Management Collaborative Alternative Team

Charter and Participant Commitments

PURPOSE: The Inyo National Forest Over-Snow Vehicle Travel Management Collaborative Alternative Team (CAT) is an independent community-based body of stakeholders. The primary goal of the CAT is to develop a stakeholder-based recommendation that balances over-snow vehicle (OSV) travel, various forms of winter recreation, and minimization of impacts to forest natural and cultural resources, sensitive habitats, and all visitors to the public lands. The CAT seeks to minimize conflict between different forms of recreation and between recreation of all types and the environment.

CAT recommendations will be based on the best information available to the group. Recommendations will be submitted to the Forest Supervisor for review and consideration in the project development and review effort.

The Forest Supervisor is committed to considering recommendations of all stakeholders and recognizes the unique contributions the CAT could make to the development of alternatives.

COLLABORATIVE SCOPE: Collaboration could include, but is not limited to, discussion of the following:

- Identification of where there is already agreement on OSV areas and routes, both groomed and ungroomed.
- Discussion of potential minimization criteria and their applicability to the alternatives.
- Identification of which routes or geographical areas have potential for collaborative resolution.
- Discussion of specific routes or geographical areas with the intent of finding common ground – developing consensus – and documenting where agreement is reached. Areas/routes of non-agreement are also documented.
- Discussion on any other issues that the group chooses to tackle, where they think there is potential to reach consensus resolution.

MEMBERSHIP AND RESPONSIBILITIES: Members of the group are by their personal knowledge, association, constituency, or organization involved in or related to winter activities in the Inyo National Forest. Members have a local perspective, topical, on-the-ground knowledge, and the ability to work collaboratively with people having views different from their own. Members are expected to:

- As appropriate act as a liaison and communicate information to and from their organizations.
- Offer the perspective of a good citizen, an independent thinker and trustworthy individual.
- Build trust among all stakeholders.
- Contribute data/information to clarify issues and eliminate false assumptions.
- Will not represent individual views as views of the CAT or make public confidential conversations.

- Work to ensure acceptance and understanding of the OSV management planning process and environmental review when undertaken.

ATTENDANCE: Attendance at meetings is important for the continuity of the group. Those unable to fully participate will be asked to re-evaluate their membership.

DECISION MAKING PROCESS: This is a consensus seeking process. The full group will consider all decisions or recommendations. To determine a degree of consensus, members will note their level of support for items as ranging from Unqualified Support, Strong Support, General Support, Qualified Support, to Fundamental Disagreement. Issues without out a broad degree of support will not move forward as representing the views of CAT. The level of support for various items will be recorded. If an item receives a level of Fundamental Disagreement, the group will be asked to continue working until it appears a resolution is not attainable or move on to an area where more agreement is possible. At that time the members will note the nature of the disagreement and decide as to the best way to proceed in the particular issue area.

Minor and major decisions: Not all decisions will have the same level of impact. Simple voting may be adopted for procedural or non-policy matters.

Select decision process in advance: Proposals for action should include the decision process to be used in considering the item.

Members are expected to always contribute their best personal thinking, regardless of the initial positions of their sponsoring organizations. Collaboration cannot be effective unless all parties, including sponsoring organizations, are open to modifying their initial positions. Members are responsible for promoting understanding of CAT recommendations to the organizations they represent.

GROUND RULES

1. Use standing meeting ground rules (see attachment)
2. When discussing the work of CAT, meeting attendees will avoid attributing statements to individuals.
3. Items presented as confidential will not be disclosed in other forums or used in a way to disadvantage any member of the group.
4. Members shall act in good faith in all aspects of this consensus-building process.
5. Members shall communicate their interests and positions.
6. Members shall not engage in personal attacks or stereotyping.
7. Members shall refrain from impugning the motivations or intentions of others.
8. Members shall not make commitments they do not intend to follow through.
9. Members shall act consistently in the CAT and other forums where similar issues are being discussed, including with the press.
10. Members agree to provide requested information to other members or explain the reason why not.
11. The commitment to work for consensus means that members will:
 - Participate in the give and take of the process in a way that seeks to understand the interests of all,
 - Actively generate proposals thought to be workable for all, and
 - Work together to reach consensus.

STANDING GROUND RULES

There will be continuous opportunities for group discussion. You are asked to subscribe to several key agreements to allow for productive outcomes

USE COMMON CONVERSATIONAL COURTESY - Don't interrupt; use appropriate language, no third-party discussions, etc.

HUMOR IS WELCOME AND IMPORTANT, BUT humor should never be at someone else's expense.

ALL IDEAS AND POINTS OF VIEW HAVE VALUE - You may hear something you do not agree with, or you think is "silly" or "wrong." Please remember that the purpose of the forum is to share ideas. All ideas have value in this setting. The goal is to achieve understanding. Simply listen, you do not have to agree.

PARTICIPANTS MAY CHANGE THEIR MIND - During the course of the sessions, some participants may change their perspective regarding one or more items. Group members reserve the right to change their mind and not be held to a previous position.

50-MILE RULE - Most of the participants have demanding responsibilities outside of the meeting room. Your attention is needed for the full meeting. Please turn cell phones, or any other communication item with an on/off switch to "silent." If you do not believe you will be able to participate fully, please discuss your situation with the facilitator.

BE COMFORTABLE - Please feel free to help yourself to refreshments or take personal breaks. If you have other needs, please let the facilitator know.

SPELLING DOESN'T COUNT - writing on a vertical surface (like blackboards or flipcharts) increases the number of spelling errors – ideas are more important than spelling.

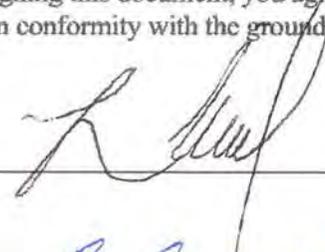
HONOR TIME - We have an ambitious agenda, in order to meet our goals, it will be important to follow the time guidelines given by the facilitator.

AVOID EDITORIALS - It will be tempting to analyze the motives of others or offer editorial comments. Please talk about YOUR ideas and thoughts.

VOTING – We are not voting unless we say we are voting. Silence is not consent. Decision making will be clear.

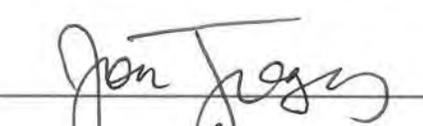
COMITMENT TO PROCESS & GROUND RULES

By signing this document, you agree to participate on the CAT in good faith and to work constructively and in conformity with the ground rules and the spirit of the effort.

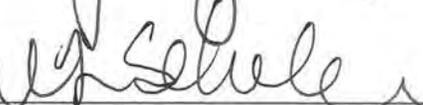


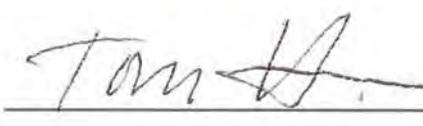


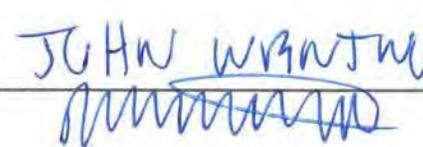


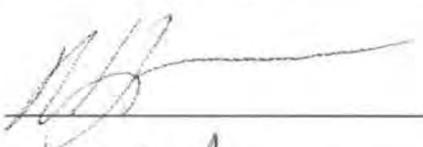








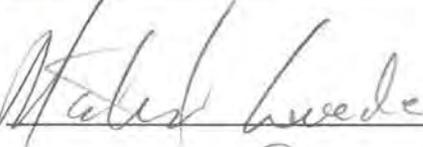














ATTACHMENT 3

OSV Management Proposals and Minimization Suggestions Presented to Inyo National Forest

Overview: Each location that was discussed was assigned an Item number and a Map ID number that was placed on large maps that were posted on the meeting room walls to assist in the discussion (Note: visit the USFS website [here](#) and look in the folder named “OSV Current Condition Maps and GIS Files” to see the actual maps). All proposal ideas from participants were captured and are presented in the table. Potential issues, feedback on the proposal and suggestions for addressing potential issues are presented in the table as provided by the participants. Participant’s comments and feedback have not been edited nor revised.

Item #	Map ID	Area / Location	Proposal	Potential Issues / Proposal Feedback	Suggestions for Addressing Potential Issues
1	1-A, 1-G	Hartley Springs/Obsidian Dome Nordic ski area and surrounding closure	a. Maintain as groomed Nordic ski area and surrounding closure as-is.	<ul style="list-style-type: none"> - No reason for OSV closure all the way to the June Lake loop to the North. - The existence of a groomed xc ski trail has precluded far too much cross country OSV use in the area. - Because most of this area is closed to OSV use through Wilderness, any areas that can allow OSV use needs to be prioritized. - There is no reason to have the entire area closed, because that area is not heavily used for backcountry skiing. 	<ul style="list-style-type: none"> - Increased law enforcement, signage, and education - Good location for trail hosts

			<p>b. Reduce the size of the OSV closure area, leaving a smaller buffer around the groomed trails only.</p>	<ul style="list-style-type: none"> - The larger area is important to retain as non-motorized because it provides the only dedicated non-motorized area outside of Lakes Basin. - Yet skiers must stage alongside snowmobilers, and we see increasing motorized encroachment and aggressive behavior. - Reducing the size of OSV closure would lead to more incursions into Nordic ski area and/or Wilderness. - This is an increasingly popular backcountry skiing access corridor to Chicken Wing etc. - Consider effects to pine marten – this is an area of important habitat. - Known goshawk habitat. - If there is not significant scientific evidence OSV use within the forest is negatively impacting the Pine Marten, then this should not be taken into consideration and used as a reason to limit OSV use. 	<ul style="list-style-type: none"> - Add rock creek as another option for groomed non-motorized along with entire wilderness for non-groomed non-motorized - - Sign the area accordingly to delineate motorized from the non-motorized areas. Use natural features to make life easier. - Noise for Nordic skiers should not be listed as a potential issue. The amount of time Nordic skiers encounter OSV use is minimal. If you are considering noise for Nordic skiers, then you need to consider issues for OSV users because of Nordic skiers. - Partner with user groups to help develop education, outreach, signs, trail markings, and other materials to inform all users. - Improve education, signage, and create more user-friendly maps (digital and hard copy) so boundaries are better understood on the ground. - If more area is opened, better signs and a designated crossing for the cross-country ski area, with a slow zone at the existing G-trail crossing. This should prevent noise increases for skiers and will keep OSVs out of groomed trails. - Use natural barriers to delineate wilderness / closed areas. - Appropriate area for trail hosts/ambassadors. - “Possible Wilderness incursion” is not reason to restrict and limit use. If this is happening, with evidence, then better management needs to occur rather than not allowing OSV use. - There should not be “buffer zones” to Wilderness. If Congress wanted these areas to be off-limits to OSV use and recreation, they would have designated this area as Wilderness. - Potential impacts to at-risk species (threatened, endangered, species of conservation concern, and others called out in the land management plan) will be evaluated in the NEPA process. Each species will be analyzed separately to determine whether, how, and to what degree OSV use can impact the species.
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Item #	Map ID	Area / Location	Proposal	Potential Issues / Proposal Feedback	Suggestions for Addressing Potential Issues
			<p>c. Improve parking situation by separating uses at the staging area, realign Nordic and OSV groomed trails, and designated OSV routes that avoid the Nordic area. Could include creating a better highway crossing</p>	<ul style="list-style-type: none"> - Could be expensive - May require more ground disturbance and resource impact from that ground disturbance. - If groups are separated by parking areas, there must be a legal way to cross the road. 	<ul style="list-style-type: none"> - Sign and enforce the groomed OSV trail so that one side is non-motorized and the other is motorized. May require wider groomed trail at this location.

Item #	Map ID	Area / Location	Proposal	Potential Issues / Proposal Feedback	Suggestions for Addressing Potential Issues
2	1-B	Sand flat south of Wilson Butte	Closure line across the southern side of area is impossible to see when you're on an OSV and should be moved to somewhere visible to the users.	<ul style="list-style-type: none"> - Area may have been recently burned and possible impacts to vegetation need to be considered. - Open to OSV use up to the first groomed trail at the south end of this area 	<ul style="list-style-type: none"> - Clear and visible signage. - Use the tree line as a natural barrier - Open the entire area around Wilson Butte. - Improve digital maps. - Education may help with any issues related to recent burns. - Explain how a recent burn would affect OSV designation. It likely has no bearing because OSV use is over snow. - If the area was recently burned, follow the BAER report for appropriate recommendations and mitigations.
3	1-C	Saddlebag Lake/ Tioga Pass area	a. Designate for OSV use everywhere outside of Wilderness	<ul style="list-style-type: none"> - Yosemite toad effects in spring, which is time when the area is most likely to be used by OSVs, need to be considered. - Access to this area via OSV relies entirely on snow coverage on the south facing Tioga Pass Rd. If this is even possible, there is feet to tens of feet up on the pass. No hibernating frog will be disturbed. - Bighorn sheep effects from noise and presence of OSVs need to be considered. - Sierra Nevada Red Fox effects need to be considered. - World class non-motorized backcountry ski and Nordic touring zones. Snowmobiling is not expected or appropriate. The area outside of Wilderness and National Park is too small to support cross-country snowmobiling without significantly impacting soundscape and diminishing the natural experience. OSV use in this area would greatly adversely impact 	<ul style="list-style-type: none"> - Potential impacts to at-risk species (threatened, endangered, species of conservation concern, and others called out in the land management plan) will be evaluated in the NEPA process. Each species will be analyzed separately to determine whether, how, and to what degree OSV use can impact the species. - Domestic sheep disease killed the bighorns, not OSVs. - Consult with California Department of Fish and Wildlife and US Fish and Wildlife Service. - Consult with Caltrans on any plan. - If incursion is an issue, then better management practices need to be implemented rather than closures or restrictions. However, real evidence of incursion needs to be provided before any changes occur. Don't create a solution to a problem that doesn't exist. - Clear and visible signage and maps to delineate Research Natural Area and Wilderness areas. - If law enforcement and access is an issue, consider prohibiting OSV use.

Item #	Map ID	Area / Location	Proposal	Potential Issues / Proposal Feedback	Suggestions for Addressing Potential Issues
				<p>a natural area and the experience of the many for the benefit of a very small few.</p> <ul style="list-style-type: none"> - Major Avalanche danger on 120 during early and mid-winter; after 120 is plowed, Saddlebag Road is hardly worth snowmobiling just for ski access (esp. as it diminishes everyone else's ski experience for the sake of a few people getting a bump of a couple extra miles) - Invites incursion into the Research Natural Area. 	<ul style="list-style-type: none"> - Perhaps identify a section for OSV access to skiing and hunting without allowing the whole area. Limited OSV use to Saddlebag Road - Nothing open 'invites' anything. No one knows maps and boundaries as well as OSV users because we have to. Every forest in the nation has closures up to wilderness or other boundaries. This is a made up 'problem'.
			<p>b. Continue with current OSV management, with closure around Saddlebag Lake</p> <ul style="list-style-type: none"> - Need to consult with owners of Tioga Pass Resort and Saddlebag Resort. - Seasonal concerns can/should be addressed through management, not closures. - How are these non-motorized users getting up Tioga Road in winter? 		
			<p>c. Close entire area to OSV use. It is not used often by OSVs and it diminishes the experience for many to benefit only a few.</p> <ul style="list-style-type: none"> - Highway 120 is not under the jurisdiction of the Forest Service, and therefore this decision cannot cover highway 120. The decision does need to consider area outside of 120 right-of-way and Saddlebag Lake Road. - Consider allowing use only on Saddlebag Road - It is not possible to remain only on Saddlebag Lake Road because it becomes heavily wind drifted from the trees along the road acting as wind screens. The meadow below/west of the road must be open to allow travel. 		

Item #	Map ID	Area / Location	Proposal	Potential Issues / Proposal Feedback	Suggestions for Addressing Potential Issues
				<ul style="list-style-type: none"> - Saying saddlebag lake road is hardly worth snowmobiling is an opinion and one that is not shared by those who have snowmobiled up to the Lake. This provides access for backcountry skiing in the area. 	
4	1-U	Parker Bench	Consider need for seasonal restrictions for sage-grouse leks and wintering areas. Could be speed limits, restrictions on cross-country travel, or seasonal closures.	<ul style="list-style-type: none"> - Could affect backcountry access to Mt. Woods and nearby areas which are popular for backcountry skiing, often accessed via snowmobile. 	<ul style="list-style-type: none"> - Allow one or two corridors for OSV access, where it could avoid important sage-grouse areas. - Monitor for effects of OSV use on sage-grouse
5	1-D	Silver Lake Resort and the Hwy 158 area when closed due to snow	a. Close Highway 158 footprint (June Lake Loop) to OSVs at the Rush Creek Powerhouse closure, to the Silver Lake Resort, for non-motorized access.	<ul style="list-style-type: none"> - The entire length of Highway 158 is a State Highway and therefore the type of use that occurs on the road itself is not under the jurisdiction of the Forest Service - Closure might affect OSV access from the Town of June Lake to the north. - Dog walking can impact wildlife and habitat just as any other type of recreation. All recreation should be allowed and can be accommodated here 	<ul style="list-style-type: none"> - OSV users can drive over the lake or to the east of Silver Lake to access areas to the north.

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			<p>b. Allow OSV use on the entire length of Highway 158 beyond winter closures (current condition)</p>	<ul style="list-style-type: none"> - This is a popular pedestrian zone in winter for dog walkers, ice skaters, ice climbers and backcountry ski access. Turning this into and promoting as a snowmobile route would greatly impact the activities of most people with soundscape/noise issues for ice climbers and general motorized conflict (noise, exhaust, etc.) for pedestrians—again for the benefit of very few users. - Multi-use should be available on Highway 158. There isn't a better place for both motorized and non-motorized than an existing roadway where separation can be provided. 	
			<p>c. Allow OSV use on Highway 158, but not between Highway 158 and Silver Lake along the shoreline.</p>		
6	1-F	South side of Mono Lake	<p>Allow OSV use in the area that is currently closed, along the shore on the South Side of Mono Lake.</p>	<ul style="list-style-type: none"> - The area was closed in the Mono Basin Scenic Area Plan and opening the area to OSV use would require an amendment to that plan. - The land ownership of the relicted lands along the lake shore is not clear. All I can find on who owns the relicted lake shore is a ruling by the 9th district court of appeals in 1987 that said the land is owned by the federal government. - System connectivity is important. 	<ul style="list-style-type: none"> - Engage with the State. What does their management plan say? - Review system connectivity between USFS groomed trail system and popular riding areas like the Bodie Hills. Do we want to create dead end trails or work to create a corridor to maintain connectivity?

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7	1-H	Currently closed area east of White Wing Mtn. in Upper Deadman area	<ul style="list-style-type: none"> a. Allow OSV use in this area. b. Do not allow OSV use in this area. 	<ul style="list-style-type: none"> - Open the closed red circle-ish area, if you keep anything closed, keep the cherry stem closed. - High use established backcountry ski zone. 	
8	1-I	Cherry stem on Deadman Creek – currently closed to OSV use	<ul style="list-style-type: none"> a. Keep this cherry stem closed to OSV use. It is a small area, does not provide a lot of terrain to OSVs, and is an area with documented Wilderness incursion. 	<ul style="list-style-type: none"> - This area is not wilderness and should not be treated as such. It provides access to backcountry skiing via OSV. - Access does not encourage incursions. There are many open areas adjacent to Wilderness areas on the Inyo National Forest. 	

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			b. Open the area to OSV use.	<ul style="list-style-type: none"> - Difficult to delineate Wilderness in this drainage - Wild and scenic river corridor needs to be analyzed. Limit use to non-motorized in areas that are part of the Wild and Scenic River corridor to protect water quality and riparian habitat - It is a road and therefore wild and scenic river corridor is already eroded; OSVs will not cause any greater impact than a road. - Allowing OSV use in this canyon would impact the natural soundscape and greatly diminish the backcountry skiing experience and invite Wilderness trespass. Folks can access the base of the canyon by snowmobile (at Deadman CG) and proceed from there on skis. 	<ul style="list-style-type: none"> - Possibly allow OSV use on the road only, which is almost the way it is cherry stemmed in anyway. - Sign the Wilderness boundary better
9	1-J	Closed area right by MCWD private land	Fix the mapping error		

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10	1-K	Linkage between Shady Rest and Sherwin areas	Provide tunnel to allow OSV access underneath highway	<ul style="list-style-type: none"> - If it needs to cross private land or areas under jurisdiction of the Town or other agency, the Forest Service may not be able to decide on OSV use of this tunnel - OSV access under highway between RV park and Shady Rest to access broader OSV network makes great sense so that snowmobilers don't have to trailer their sleds across the road. Establishing a designated route between Shady Rest and the eastern end of the Sherwins is a whole different can of worms given the likelihood of impacts to neighborhoods and town MUPs. - Also, would benefit those storing their snowmobiles at the industrial park, and they would not have to trailer and take up parking elsewhere. - Management would need to occur along with signage. Two different pieces to using the tunnels that allows access across 203 & Meridian BLVD. Both access points can assist in separation of uses and access to different areas. - Tunnel may not be designed for motorized use. 	<ul style="list-style-type: none"> - The USFS can acquire a right-of-way to allow access through private land. - Work with Town of Mammoth Lakes. - This would be TOML lead planning effort. - Potentially expensive/much more detailed plans & research would need to be done. - Coordinate with Caltrans if it would be within the Hwy 203 right-of-way

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11	2-A	Rock Creek	<p>a. Open to OSV use. Not being groomed for Nordic anymore. Why should that be closed? Could provide good access to skiers.</p> <p>b. Do not open this area to OSV use. It is an established Nordic and backcountry ski area</p>	<ul style="list-style-type: none"> - Established Nordic area - Area may be groomed again in the future - Resort owner has not been consulted yet. - The SnoPark in Rock Creek Canyon is very popular as a dedicated non-motorized trailhead for pedestrians, Nordic skiers, and backcountry ski access. Providing access up this road snowmobiles would greatly diminish the experience and displace a great many non-motorized users and impact the natural soundscape in the whole canyon. - Staging area/parking area space is limited could be a conflict issue if open to OSV. - No longer being groomed for Nordic skiing. A past use should not dictate current use. - Special use permittees do not have exclusive use of National Forest. One resort should not dictate use for the entire canyon. - Data on special use permits need to be analyzed before implementing as these often cater to certain classes and groups of people. 	<ul style="list-style-type: none"> - Talk to resort owner. - Allow one side for motorized and one for non-motorized. - Work with Rock Creek Resort and possible coordination with snopark program. Potential for joint use access area. - Try pilot OSV grooming program and assess impacts. - If rock creek road is not getting groomed for XC skiing, or other non-motorized use, then motorized should be allowed.
12	1-M	Crater Flats	Remove the small slivers of closed area adjacent to Wilderness. Currently closed areas do not make sense.	<ul style="list-style-type: none"> - The Wilderness boundary may not be clear in this area on-the-ground. It may be clearer to have the OSV use boundary be something that can be seen on the ground, such as tree line. - Buffer zones to Wilderness should not exist. Remove these closed areas. 	<ul style="list-style-type: none"> - Better maps for users plus up-to-date GIS layers on personal navigation apps. Signage. - The boundary should conform with the Wilderness boundary unless these are drawn to conform with actual topographical features. Should be analyzed. - MMSA could be a good partner in this area, since Snowmobile Adventures is a major user of this area, signage, trail marking, etc.

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13	3-A	Ancient Bristlecone Pine Forest/White Mountains	<p>a. Continue to allow OSV use as described in the Forest Plan – no cross-country OSV use in the Ancient Bristlecone Pine Forest. No restrictions for the areas outside of Wilderness and Bristlecone Pine Forest.</p>	<ul style="list-style-type: none"> - Bi-state sage-grouse wintering habitat is in the White Mountains and may be susceptible to noise or direct mortality from OSVs colliding with the birds. - Sage grouse are generally not found when the area has enough snow for snowmobile use. - The non-wilderness areas are tiny compared to the entire White Mountains; consider that when analyzing effects to sage grouse. - Are studies available to show winter sage grouse using this area? Studies not being done are not an excuse to exclude users. - Incursion into the Ancient Bristlecone Pine Forest, potential impacts to young Bristlecones and cryptobiotic soils - Allowing OSVs when there is sufficient snow could create staffing/enforcement difficulties as levels in the whites are often spotty. Levels would have to be tracked and sufficient snow depths/ resource damage would need to be studied and defined. - To not allow use due to potential wilderness incursions is to create additional wilderness without congressional designation. - Please provide documentation of sage grouse getting hit by snowmobiles at over 10K feet in winter. - Cryptobiotic soils would be buried in snow. 	<ul style="list-style-type: none"> - Better signage will help OSV users know what is allowed. Sign key areas to keep people on the road or out of Schulman/Patriarch grove. - Practical minimum snow depth requirement and communication needed to protect resources in this zone. Monitoring and enforcement. - Potential impacts to at-risk species (threatened, endangered, species of conservation concern, and others called out in the land management plan) will be evaluated in the NEPA process. Each species will be analyzed separately to determine whether, how, and to what degree OSV use can impact the species. - The Forest Service and USGS has good information on sage grouse locations throughout the year and will use that information in the analysis. - There is a maze of dirt roads up there, are sage grouse getting hit by cars/OHVs? - Many miles of trails in the bristlecones, are crypto soils a concern in summer when it is actually exposed? Tons of off trail travel with folks trying to get to methuselah.

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			<p>b. Allow OSV use only on the main White Mountain Road, throughout the entire White Mountains area.</p>	<ul style="list-style-type: none"> - The road may be difficult to travel, due to windblown berms. A limitation to one road only may de-facto prohibit OSV use. - Decision already made. A change would require Forest Plan Amendment. Forest Plan does allow on-road OSV use. - How would we keep OSVs on system road and not cross-country - Area would receive limited OSV use, but one of the most scenic places to ride an OSV on the planet. 	<ul style="list-style-type: none"> - Clear maps/apps, signage, monitoring, enforcement - The road is already marked with snow stakes for research station access via snowmobile and snowcat.
14	M-D	Reds Meadow area	<p>a. There are some areas signed as not available to OSV use in the Reds Meadow Area, but they are not on our maps for this project. Put those on our map to be accurate, or if not closed, take out signs.</p> <p>b. Keep some vault toilets in Reds open if they can be maintained.</p>	<ul style="list-style-type: none"> - This closure is not on winter rec map and the Forest does not have record of a Forest Order. FS uncertain why there are signs. - Signs could be over concerns for wetlands/sensitive animal species. - Need to maintain adequate buffer between motorized use and PCT. - No OSVs on 2-mile section of the PCT corridor - The signs were placed by the park service, and the owner of Reds Meadow lodge. They are not legally placed on USFS land. 	<ul style="list-style-type: none"> - Accurate signage to discourage Wilderness and NP encroachment (people have logged snowmobile tracks deep in John Muir and Ansel Adams Wilderness coming out of Reds Meadow). Keep restrooms open all winter at Reds Meadow CG (with user group commitment to maintenance) to reduce human waste at sensitive Reds Creek and hot springs zone. - Sign the PCT crossing areas. Sign the monument if it is closed to OSV use.

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			c. Do NOT designate cross-country OSV use west of the Minaret Summit Road, which would serve as a physical feature that is easily identifiable as the motorized boundary (to prevent OSV use of the PCT)	<ul style="list-style-type: none"> - PCT – Congressionally designated area (non-motorized). Potential conflicts of use near Agnew Meadows where PCT outside of Wilderness. - Continue to allow OSV use on Minaret Summit Road and on the MVUM route to Agnew Meadows. This would result in a motorized crossing of the PCT between Minaret Summit Road and Agnew Meadows that already exists in all other seasons. 	<ul style="list-style-type: none"> - Geographic features on the landscape that are easily identified by users are the most appropriate control points for drawing up boundaries of OSV use areas (roads, creeks/drainages, ridges, meadows, etc.). The Lassen National Forest has implemented this in their OSV decision, and the Plumas National Forest has also moved in that direction.
15	M-E	Closed areas at Minaret Vista	a. Remove all closures in the Minaret Vista/San Joaquin Ridge area except those on the north side where it is very steep	<ul style="list-style-type: none"> - The area should be open to users. The Forest Service should not dictate whether areas are too steep for OSV users. The users should. - Steep terrain is erroneous. This should be removed. The USFS doesn't manage for steepness. - Users can absolutely get an OSV up the north side of minaret summit. There are more gullies than cliffs. Rider ability is not a concern of the agency. 	<ul style="list-style-type: none"> - Simplify boundaries based on terrain and communicate with maps/apps and signs.
			b. Remove all closures in the Minaret Vista /San Joaquin Ridge area.		<ul style="list-style-type: none"> - Simplify boundaries based on terrain and communicate with maps/apps and signs.

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16	M-A	Cinder Shed Parking	<p>Plow the Cinder Shed parking area again. Improve it by enlarging the site, making it flatter, and paving it.</p> <p>Allow different entity to maintain access and coordination with Caltrans as needed.</p>	<ul style="list-style-type: none"> - Unsure if any resources at the site that would be adversely affected - This is better and more sustainable access to groomed snowmobile trails, especially in low snow years. and especially if we can also improve non-motorized access at Earthquake Fault. - There is a need for high elevation public parking access. Parking for minaret vista is badly needed for OSV users. This would help. - May conflict with existing uses of SCE & Caltrans and future driveway exit from Woolly's Adventure Summit. Earthquake Fault would be a good alternative. - Will require opening of associated terrain to the north of HWY203 to OSV access. 	<ul style="list-style-type: none"> - Complete effects analysis for all relevant resources as part of the project analysis. - I understand there's cost but as a community we need to invest in public access winter amenities of this sort. - Consider parking area through NEPA for expansion, coordinate with Caltrans, and look to partners for winter parking area management. - Solidify who would maintain the parking area. - USFS has made clear that cinder shed is not a priority nor is it MMSA's responsibility to maintain. High elevations OSV access does not seem to be a concern for the USFS.
17	M-P	Snow play/sledding areas along the scenic loop, near intersection with Hwy 203	<ol style="list-style-type: none"> a. Consider designating OSV trails or otherwise reducing OSVs traveling through areas that are used by sledders and kids playing in the snow along the west and east sides of the Scenic Loop Road. b. Designate a sled hill 	<ul style="list-style-type: none"> - Smart route designation planning needed for the reasons stated. Better parking for snow play and winter camping. Snow play area that doesn't send kids into roadway. Year-round restrooms!! - As far as I know there have been no issues, this area should be left open 	<ul style="list-style-type: none"> -

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18	M-B / M-L	Earthquake Fault Parking	<p>a. Plow the Earthquake Fault parking area in the winter for multi-use parking. Increased parking could reduce pressure on other areas and reduce conflict.</p>	<ul style="list-style-type: none"> - Long road to plow for parking. The earthquake fault itself is a hazard for OSV use if they traveled east into the crack. - Dry creek drainage has Tribally identified cultural resources 	<ul style="list-style-type: none"> - Sign the area well, place snow stakes, and include education and warnings to avoid the Earthquake Fault cliffs. - All relevant resources would be analyzed by the Forest Service in this project's NEPA document if this were to be a proposal, including cultural resources.
			<p>b. Develop as a dedicated non-motorized access and snow play area. Has restrooms. Better than Scenic Loop for pedestrians and Nordic touring access. Geologic/interpretive interest in all seasons.</p>	<ul style="list-style-type: none"> - It is an open area for OSV use now and should be left that way. However, I don't feel that at this time it would make a good trailhead. Parking laid out wrong and too much area to plow for the small amount of usefulness. Could be re-examined in the future as use grows. 	
19	M-O	Earthquake Fault/Dry Creek area that is currently closed to OSV use	<p>a. Open the entire currently closed OSV area to cross-country use.</p>	<ul style="list-style-type: none"> - Overall, there is a lack of dedicated sledding/snow paly areas. Enhancing this amenity may reduce conflicts between non-motorized users (still parking concerns) and increase safety of staging area for OSV. - Needs to be necessarily linked to OSV specific off-highway parking at Earthquake Fault (see Item #18). 	

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			<p>b. Open most of the area to OSV use, except the steep area west of the scenic loop closed – steep with dense trees and so not a special opportunity for OSV use and used commonly for backcountry skiing.</p>	<ul style="list-style-type: none"> - Support OSV use access. FS is not the expert on user technical skills. If an area is closed simply because most people don't have the technical skill, then the FS is arbitrarily picking which type of users to allow and not. Different areas provide different recreational opportunities for OSV users. - Popular close-in backcountry ski (esp. storm skiing) zone on steep NE side of Earthquake Dome should remain non-motorized—too steep and tight for sleds anyway--to also include some buffer for accessible sections of blue diamond ski trail. - Better plowing for parking along the bend of scenic loop (or new small non-motorized parking area to complement motorized parking at Inyo Craters Road). - No need to close if too steep - machines will naturally not go. - More contradictions to exclude. If the area is "steep and tight" that nobody uses it, why does it need to be closed? 	<ul style="list-style-type: none"> - Move snowflake on map to the "P". Identify slow zones where uses may interact or trails cross.

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20	5-A	Kennedy Meadows	Continue to allow OSV use on route 21S08 from County Road J41 and use this as the OSV area boundary. Also incorporate ridges as geographic features to help define the boundaries and provide a non-motorized experience for PCT users.	<ul style="list-style-type: none"> - Does this area warrant OSV use designation? Snow accumulation is minimal as compared to many other areas on the forest. - PCT – Congressionally designated area (non-motorized). Potential conflicts of use near Kennedy Meadows where PCT is outside of designated Wilderness and in-between other units and agencies. 	
21	M-F	Woolly's permit area	MMSA Would like a few hundred-foot buffer for any designated OSV area to keep users away from Woollys.	<ul style="list-style-type: none"> - Special use permit holders do not determine uses outside of their permit area. - There should be no buffer zones. Where do the closures end if everything is buffered. The boundary is the boundary. - A buffer would be okay unless it cuts off OSV access. Shrink buffer if necessary to maintain access or create a slow zone corridor. - Is a defined buffer needed? Can they simply define their boundary in a way people cannot pass through it? 	<ul style="list-style-type: none"> - The boundary signs could be put at the most logical place to avoid accidental entry into areas being used by Woolly's visitors - Need to mark OSV access around the tube park for access to other open areas. Not sure if this is possible with increase in current buffer.

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22	M-G	Lakes Basin Tamarack	<p>a. Retain current management of the Lakes Basin/Tamarack area, with the area only open after Tamarack closure (April 17). Public OSV use is not compatible with their cross-country ski area.</p>	<ul style="list-style-type: none"> - Need to clarify management outside of the Tamarack ski area permit boundary, but within the Lakes Basin. Would the entire Lakes Basin area open after April 17, or only the permit area (with the remaining area always closed to OSV use)? - Consider allowing e-bikes on public access side with proper etiquette and signage - Largely speaking, the OSV community is fine with this existing management....if and ONLY if places like the Sherwins and Solitude Canyon remain open. Close those and this area needs to be opened, season-long. - Keep closing more places and you'll really need to be concerned about 'incursions' 	
			<p>b. Allow the area outside of Tamarack cross-country ski area boundary to be open to OSV use. It is effectively a buffer on wilderness as is.</p>	<ul style="list-style-type: none"> - Possible Sierra Nevada Red Fox habitat, consult California Department of Fish and Wildlife. 	
			<p>c. The entire area should be open to OSV use, including the ski area permit boundary.</p>	<ul style="list-style-type: none"> - The decision to close this area was made previously, with NEPA and public input, and the Forest Supervisor is not required to revisit that decision to comply with Subpart C. 	<ul style="list-style-type: none"> - Increase signage and education and make better maps.

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			d. Allow OSV access only on designated routes	<ul style="list-style-type: none"> - When permit season ends, given ongoing nonmotorized use (multiple use: pedestrian, bicycle, Nordic and backcountry skiing) throughout the basin, plus increasing Wilderness encroachment (over Mammoth pass and up Coldwater into JMW) snowmobiles should only be allowed on designated routes. 	
23	1-N	June Mountain Ski Area	Allow OSV access on mountain after ski operations close, but there is still adequate snow coverage	<ul style="list-style-type: none"> - May interfere with June Mountain post-season operations and maintenance. The ski area management would not like to allow this but is willing to discuss it further. - OSV users avoid driving over vehicles and equipment all the time. No one is going to interfere with post season operations, which are concentrated at the mid mountain lodge. Stevens Pass, Mt Rose Ski Area, tons of USFS lease ski areas allow this use. - This is public land. MMSA does not get eminent domain over it when their use is not occurring. - There is rarely enough snow for OSV access after June Mountain closes. 	<ul style="list-style-type: none"> - Leave it up to Mammoth Mountain Ski Area. - Discuss OSV use with Mammoth Mountain Ski Area.

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24	M-H	OSV parking area at F-trail near intersection of new road accessing Parcel A	Add a public OSV parking area to the redevelopment proposal to provide high-elevation parking for OSVs that keeps getting lost through their development.	<ul style="list-style-type: none"> - How would the area be “reserved” for public OSV users instead of being filled up by skiers. Would it be paid or permit parking? - MMSA needs to provide access at main lodge for public parking for OSV access, because they removed it in the first place. 	<ul style="list-style-type: none"> - Develop a plan with MMSA to provide for public OSV parking in/adjacent to their permit area.
25	M-I	Inyo Crater Trailhead	Consider constructing a staging area that could hold more trailers.	<ul style="list-style-type: none"> - Unsure if any resources at the site that would be adversely affected - Currently, only a few trailers can park at the trailhead, and parking is often taken by dispersed campers and skiers. - Only two trailers MAX could fit at Inyo Craters. 	<ul style="list-style-type: none"> - Complete effects analysis for all relevant resources as part of the project analysis. - Would need to designate entity to maintain the parking area. - Area may be expanded for added parking. Can also be limited when the scenic loop is closes.
26	M-J	Panorama Dome	Develop a better parking situation at the winter closure of the Lakes Basin Road	<ul style="list-style-type: none"> - This parking is not used for OSVs (except after April 17th in the few years there is snow remaining at that date), and therefore it is not likely relevant to this OSV designation project. - The road may not be USFS jurisdiction 	<ul style="list-style-type: none"> - Could be addressed outside of this planning process. It is important to address the situation, which is a mess with the current level of non-motorized use. - Can green sticker funding be used to address trailhead congestion and parking considering the limited OSV use up there? Sno-Park? - The road is in the Forest Service database as a Forest Service system road at the point of the winter closure. The Forest Service will clarify road jurisdiction as part of this process.

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27	M-K	Shady Rest Park	<p>Reconfigure the Shady Rest Winter Parking as follows:</p> <ul style="list-style-type: none"> - One motorized parking lot at the parking lot right on Hwy 203, by the RV dump. One-way traffic in the RV Dump/ parking lot loop. - Groom an OSV trail on the MUP, along the Shady Rest/Sawmill Cutoff Road. - Non-motorized users would be encouraged to park at the visitor center front parking lot. 	<ul style="list-style-type: none"> - Uncertain whether winter motorized use can be allowed on the Town’s multi-use paths. - Uncertain who would plow the multi-use paths. - Would affect all winter users’ access point. - Need to ensure that all Ormat activities and requirements for their new construction and maintenance are well understood and incorporated into the analysis and proposal. - Need to consider the Shady Rest Nordic Trails - This would allow for better access and staging for all user groups, not any one group. The groomer has to get from the garage to the trail system so even if road has to be plowed there could be motorized access from this staging area. 	<ul style="list-style-type: none"> - Build overpasses/bridges for pipes that interfere with OSV use or this specific proposal. - Improve partnership with Ormat for improvement and sustainability of groomed trail infrastructure. - USFS should consider program to work with local partners to assist with grooming trails and annual markings/signage to designate use areas. Include considerations for enhanced groomed XC trails and staging areas for this use. - Ensure coordination with CG concessionaire. - It does not appear that the proposal considers existing decisions made by past Mammoth District Rangers re: OSV / OHV staging in Shady Rest please see this link for more information https://mltpa.org/projects/planning/focused-planning-efforts/shady-rest-motorized-staging-project-2011 - As stated in person during at least two of the project meetings, the USFS and all parties must enforce and abide by the mitigation measures authorized in the final NEPA / CEQA decisions for the ORMAT project. USFS and ORMAT have consistently ignored these mitigation measures. Please see separately provided documents which are excerpted from the NEPA decision and which support some of the suggested solutions for item #26. - It was also requested during the project meetings that USFS, USGS, BLM, Mono County, and any other relevant agencies of authority produce a definitive set of documents with relevant citations and clearly articulated summaries of the responsible parties to assist in the management of the Shady Rest recreation area. That needs to be a stipulated part of any final proposal.

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28	M-M & M-N	Solitude Canyon/ Sherwins area	<p>a. Allow the entire Sherwins/ Solitude Canyon area to remain open to OSV use, outside of Wilderness (current condition).</p> <p>b. Close the area west of the tank farm parking to OSV use, and designate for</p>	<ul style="list-style-type: none"> - Possible Sierra Nevada red fox habitat. - Safety and noise concerns in the community of Old Mammoth - Look closely at effects to mule deer, particularly in Solitude canyon. - Spring mule deer migration corridor, if open to OSVs needs to at minimum have a closure of April 1. - There are no mule deer in Solitude Canyon in Winter. - OSV users have been using that location for decades with no known negative affect. - Impacts on plants and animals need to be identified. - Potential for collisions with families engaging in snow play, off leash dogs/coyotes, and noise apply to this same as Item 28. Multiple interests will need to be weighed as a multi-use area. - More erroneous references to “only a handful of OSV users” being in the area yet there are so many conflicts the area must be closed to them? This is contradictory. - Remove references to snowmobiles hitting people. Are there any documented cases of snowmobiles hitting family, dogs, and coyotes in the Sherwins? <ul style="list-style-type: none"> - Economic analysis needs to be done with ANY type of loss of recreational opportunity for OSV users. - East of the Tank Farm is already open. Further closures in the Sherwins are non-negotiable in the OSV community. There is nowhere else on the 	<ul style="list-style-type: none"> - Potential impacts to at-risk species (threatened, endangered, species of conservation concern, and others called out in the land management plan) will be evaluated in the NEPA process. Each species will be analyzed separately to determine whether, how, and to what degree OSV use can impact the species. - Identify one single “safety” issue that has occurred in the last 20 years where someone’s “safety” was compromised. - Access in the Sherwins and separation of uses should follow recommendations in the SHARP Documents as previously noted. - Remove references to snowmobiles hitting people. Are there any documented cases of snowmobiles hitting family, dogs, and coyotes in the Sherwins? <ul style="list-style-type: none"> - See SHARP <u>report</u> and <u>map</u> for recommendations for this area. The SHARP plan was developed through a collaborative process and addressed several concerns raised regrading OSV / XC / Back County skiing in the area.

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			OSV use east of the tank farm	<p>Forest with this kind of reliable snow coverage and terrain. This is all OSV users have.</p> <ul style="list-style-type: none"> - Everything east of the tele bowls should remain open. Sherwins are one of the few high elevation areas. Areas need to remain open unless studies prove negative impacts, not the other way around. - Someone’s opinion or dislike of a use does not constitute a conflict. Documentation of the number and scope of complaints and activities such as high pointing up the hose will assist in management planning. - This would be a major improvement for a large majority of winter recreation users and property owners and signal a firm commitment on the part of the forest and TOML to providing world-class nonmotorized close-access backcountry skiing and public access Nordic skiing amenities, while impacting only a handful of OSV users. - There are many off-leash dogs/children & family engaging in snow play west of the tank farm every day. Closing the west and opening the east would allow OSV users to navigate areas without these potential collisions. - Solitude Canyon is literally the ONLY steep mountain terrain open on the entire forest. Closing it is unacceptable. There is no other place in the INYO with this kind of terrain that gets RELIABLE snow coverage. Glass Mountain has the terrain, but it is 	<ul style="list-style-type: none"> - Would non-motorized be prohibited from east of the tank farm? It is unfair that only motorized use is regulated. - The 2009 Sherwins Area Recreation Plan (SHARP) is an adopted policy document of the Town of Mammoth Lakes including programmatic CEQA, and the Town will assert its interests with regards to the plan. The Winter Recreation Proposal makes numerous references to OSV activity, and it should be linked and incorporated into the proposal for item #27. Here is the link to the Winter component of SHARP: https://mltpa.org/images/downloads/SHARP%20SWG%20Winter%20Proposal.pdf - And here is a link to the SHARP project page with additional information: https://mltpa.org/projects/planning/collaborative-processes/sharp-2009

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				<p>too finicky with coverage from year to year. Further closures will cause OSV users to use Wilderness and other closed areas.</p> <ul style="list-style-type: none"> - Because of the large amount of Wilderness so close to communities, particularly the Town of Mammoth Lakes and June Lake, the Sherwins/Solitude Canyon is the only place for this type of steep terrain, and it is of course near town because Wilderness is everywhere else. Being near town is not an excuse to prohibit OSVs. 	
29	1-P	June Lake Junction	Continue to sign and manage this area as an OSV staging area.		
30	1-Q	Bald Mountain Road (east of Hwy 395)	Continue to use this as an OSV staging area. Add warning signs at highway crossing		
31	1-R	Snow Play area at Deadman	Consider methods for reducing conflict or safety issues. Very congested with sledders, but also provides access to H and G Trails (groomed OSV trails)	<ul style="list-style-type: none"> - Work to address these issues to minimize conflicts and maximize user fun. - Expand parking area as needed. An expanded parking area should be part of the NEPA process. - TOML Trail hosts cannot be deployed at Deadman, because it is out of the Town's Jurisdiction. 	<ul style="list-style-type: none"> - Trail hosts - Signage

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32	1-S	West Portal overlook	Continue to allow OSV staging - Can access Mono Craters from the Front side, and get on the "I" trail, get into Big Sand Flat, and back side of craters (1-T)	<ul style="list-style-type: none"> - Possible bi-state sage grouse impacts. - See same comments on Item #14. 	<ul style="list-style-type: none"> - Practical minimum snow depth requirement and communication needed to protect resources in this zone. Monitoring and enforcement.
33	M-C	Highway 203 between winter closure and Minaret Vista	Separate non-motorized and motorized use along the roadway. Either with a trail groomed specifically for OSVs, off the road, or by designating one side of the road for OSVs and one for non-motorized.	<ul style="list-style-type: none"> - Is there evidence showing real user conflict making this an issue? All users should be accommodated. - The ski area uses a short section of this as a return groomer and does rope it off. There are no issues here that have arisen in the decades of current use. The largest issue is public parking for OSV access. - Uncertain where grooming for OSV trail off the main road would be. There is no room. How would creating a new OSV trail be less impactful? - Significant conflict between motorized and non-motorized uses on this highly popular route simply because of unnecessary overlap. Users without snowmobiles have argued for closing Minaret Vista to OSVs due to snowmobile ruts, noise, exhaust. - Need to coordinate with Mammoth Mountain Ski Area. They would likely need to do the grooming and place signage because part of this is within their permit area. 	<ul style="list-style-type: none"> - Cannot overstate the benefit that would come from separating access corridors to Minaret Vista, maintaining access for all users but limiting unnecessary and incompatible overlap. One groomed snowmobile access trail and another separate groomed Nordic access trail would turn this zone into a true amenity for all. Let's work together with MMSA and make this happen! - USFS will need to determine how to support management of regulations implemented including here.

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				<ul style="list-style-type: none"> - MMSA runs snowcat tours to Minaret Vista so consideration needs to be taken when determining non-motorized route, if separating. - MMSA currently grooms to Minaret Vista although not specifically for XC. - Support separation but will place added management responsibility on USFS and to manage it and maintain it. This wouldn't be cheap. - More contradictions. There are mentions of noise and how negative that is for users but then there is support for separate trails a couple hundred feet from each other. Is noise no longer a concern then? Or simply being used in specific areas? 	
34	2-B	Wheeler Crest	Continue to allow OSV use on the Wheeler Crest Access Road.	<ul style="list-style-type: none"> - Sierra Nevada Bighorn Sheep critical habitat. - The access is blocked by the Rock Creek closure 	<ul style="list-style-type: none"> - Note from Erin – a review of the map shows that there is currently an open corridor on the very east side of the Canyon between the closure and the Wilderness to allow access to Wheeler Crest. If the area remains closed, consider whether a different configuration is necessary to allow true, viable access.
35	1-V	Boy Scout Camp access road off Highway 120	Keep this road open to OSV use. It is an important access point		
36	1-W	Lundy Lake\ Canyon	Keep this area open to OSV use. It is an important area		

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37	NA	Forest wide	a. Set a 12-inch minimum snow depth for off-road OSV use.	<ul style="list-style-type: none"> - Minimum snow depths are arbitrary. Don't create a solution to a problem that cannot be proved to be there. If there is no evidence that OSV use on areas with insufficient snow is impacting areas, then the FS should not implement snow depth requirements. - There is no data to show that snow depth requirements are needed now. 	<ul style="list-style-type: none"> - Clarify how enforcement would work with snow depth and what that snow depth would be used for. - USFS MUST be onboard to manage snow depth. If they cannot manage this daily in winter, no snow depth should be set.
			b. Do not set any minimum snow depth for OSV use. The requirement should only be to prevent resource damage as per existing CFRs.	<ul style="list-style-type: none"> - The Region 5 Programmatic Agreement with the State Historic Preservation Office (SHPO), sets "12 inches of compacted snow" as the snow depth that protects archeological resources on the ground. - Setting a snow depth makes it easier to analyze effects. 	<ul style="list-style-type: none"> - Work with SHPO to set up monitoring or other ways to minimize impacts to archaeological resources, if no minimum snow depth is defined.
			c. Treat over snow electric bicycles (fat tire e-bikes) as OSVs for this designation process.		

ATTACHMENT 4

OSV Management Concepts Presented to Inyo National Forest Proposal & Issues

I would like to thank each and every participant in this process and would also like to thank the Inyo NF for opening the table up for discussions.

I had started to go point by point through each line item to address resource issues, Wildlife and Habitat issues and use conflicts but as I started to list each for each line item it became clear a common theme emerged. First, let's set the stage for clarity. The United States is seeing a sharp increase in recreational users of all types, all backgrounds, and all abilities. A purpose of public lands is a means for all users to experience the outdoors for generations to come. Having said that, to single out a user group with a management plan is really counter intuitive. Much as a project can not be pieced together to avoid environmental review, a travel management plan should not be piecemealed either but here we are.

My main points across the board for all areas discussed:

Inyo National Forest should be considering, in all cases, adding more staging areas to distribute users over a wider area. Concentrating any user group only leads to environmental impacts. Be it walk, hiking, fishing, or motorized use.

Inyo National Forest should be addressing education and enforcement across all user groups and forest wide. All user groups have their bad apples, no exceptions. Enforcement without education is a short-term solution likewise, education without enforcement is as well.

As far as environmental impacts are concerned, any lens through which motorized use is viewed must also be used for all other recreation user groups. No special treatments or exemptions for any groups. And all impacts looked at in totality PERIOD. All criteria for assessing motorized impacts should be applied equally to all uses and recreation endeavors. No segregation of rules or enforcement.

The Inyo National Forest should be looking at future recreation needs. A plan that meets the needs currently will be out paced by the growth of recreation users very shortly. Likewise, ALL user groups should be working together to help define the type of recreation opportunities we and our successors will have.

A shared use policy and ethos must be core to any plan. No one type of recreation favored nor any type of lawful recreation discounted. Users must be educated to adopt a shared forest mentality. It is not any one user groups "private playground" no matter how loud the voice.

Any described “potential” issues must have solid merit. For example, to simply state a trail or area may lead to trespass into another area is so broad and open that it implies no access is only option. If one follows this philosophy to its broadest sense, all trails and all recreation has the potential to cause impacts and therefore should be prohibited.

Inyo National Forest should be looking to partner with any and all grass roots groups to help manage, maintain, educate, and protect everyone’s public lands.

No one agency or group can do it alone. This must be a cultural shift, no “us”, “we”, “them”...change it to ALL.

It is my deepest wish Inyo National Forest listens to all user groups and takes into meaningful consideration the needs for all and does not acquiesce to those groups who yell loudest or have the deepest pockets.

Shared use for all.

Once again, my deepest gratitude for the opportunity to take part in this process and my most heartfelt thank you to all who participated.

Sincerely,

Michael Lueders
Valley Outdoors.