



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

(submitted electronically to <https://cara.ecosystem-management.org/Public/CommentInput?Project=3375>)

August 22, 2016

Planning Team Leader, Forest Plan Revision
1323 Club Drive
Vallejo, CA 94592

Dear Planning Team Leader:

The attached document contains the comments of Snowlands Network on the *Draft Environmental Impact Statement for Revision of the Inyo, Sequoia, and Sierra National Forests Land Management Plans* and the *Draft Revised Land Management Plans* for the Inyo, Sequoia, and Sierra National Forests.

Thank you for allowing us to comment upon this important forest plan revision process. Please contact us if you would like any additional information concerning our comments.

Sincerely,

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Comments on
Inyo, Sequoia, Sierra National Forest Land Management Plans Revision
Draft Environmental Impact Statement and Forest Plans

Snowlands Network
August 22, 2016

Introduction

This document contains the comments of Snowlands Network on the *Draft Environmental Impact Statement for Revision of the Inyo, Sequoia, and Sierra National Forests Land Management Plans* and the *Draft Revised Land Management Plans* for the three forests.

Snowlands Network is an organization that advocates for non-motorized backcountry winter recreation on public lands. Snowlands' 400 members often visit the Inyo, Sierra, and Sequoia National Forests in the winter to ski, snowshoe, and snowboard. Snowlands members will be directly affected by the decisions made during the Forest Plan revision process and subsequent actions that will result from the revised forest plans.

Summary

Snowlands does not support any of the existing alternatives because the revision process has not adequately addressed winter recreation. The national forests need a Winter Recreation Opportunity Spectrum (ROS) map before the forest plans can be finalized. Without a winter-specific ROS map the forests will have to base winter travel planning on inappropriate desired conditions based on summer use. In addition to a winter ROS map, the final plans should include additional Wilderness recommendations beyond what is in the draft plan Preferred Alternative (B).

Recreation Opportunity Spectrum

The draft plans contain Recreation Opportunity Spectrum maps showing locations of desired recreation settings and associated opportunities for forest visitors. The maps for each alternative show the desired conditions as strategic goals for plan implementation. Since the ROS maps indicate where motorized recreation may take place on the forests, subsequent travel management plans should be consistent with the ROS maps. However, the ROS maps must not unduly constrain or pre-determine those plans, because decisions in the travel management analysis made to satisfy the minimization criteria required by the 2005 Travel Rule may result in land use restrictions that differ from the patterns in the ROS map.

Recreation opportunities in winter are vastly different from those in summer. Unpaved forest roads are inaccessible to wheeled vehicles in the winter once snow has accumulated, affecting access to the forest. Many paved roads are not plowed in the winter. Any snow-covered, unplowed road becomes a potential recreation trail for both motorized and non-motorized recreation users. Facilities are closed for the season, and buildings become unoccupied and buried by snow. Areas where motorized activity is inappropriate in the summer may be suitable for motorized travel in the winter, as a layer of snow can afford protection to the underlying landscape, provided that effective minimum snow depth restrictions are established. At the same time, roads that are open to wheeled vehicles in the summer can become important cross-country ski trails in winter and should be restricted to non-motorized use only where appropriate. Likewise, many valuable non-motorized recreation areas, such as Wilderness, are inaccessible to all but the most determined human-powered winter recreationists, leaving a need for more accessible areas that provide quiet and solitude for non-motorized visitors.

Thus, the assignments of summer ROS categories are not appropriate for forest areas covered in snow. What in summer is classified as Roaded Natural or even Rural becomes, in effect, Semi-Primitive in winter, affording such characteristics as *“High probability of experiencing solitude, closeness to nature,*

tranquility, self-reliance, and risk.” In general, as snow covers the landscape, the user experience will shift from “*rural, developed*” towards “*primitive, undeveloped.*”

Winter travel management is required by the 2005 Travel Management Rule, Subpart C, and must be done once the Forest Plans have been adopted. Although winter travel planning is listed as a “proposed or possible action” in the Sequoia draft plan there is no mention of it in either the Inyo or Sierra plan. All three plans should include a desired condition that states winter travel planning should begin within six months of the completion of the Forest Plan Revision process.

Since winter travel management must be consistent with the ROS maps in the forest plan, the changing spectrum of recreational suitability in winter versus summer must be reflected in a separate winter ROS map. It may even be necessary to modify some of the categories or introduce new ones to reflect the unique conditions in winter. At the very least, each plan should contain a description of each ROS setting characteristic for winter and summer and plan components that would achieve the desired ROS setting. The plans should specify that OSV use is not suitable within primitive or semi-primitive, non-motorized areas. The plans should also specify that although OSV use may be suitable within semi-primitive motorized, roaded natural, rural, and urban areas, Subpart C travel planning must be done to designate specific routes and areas within these categories where OSV use is allowed.

Because winter trails and areas may be shared, or OSVs may be restricted to designated routes even within areas where OSV use is suitable, Subpart C travel planning is a necessary follow-up to the forest plan revision. The exact determination of roads, trails, and areas where over snow vehicle use is allowed must be done within the rules established by the 2005 Travel Management Rule, Subpart C, including satisfying the required minimization criteria, and accompanied by the appropriate environmental analysis. The winter ROS map should be a guideline in determining only what forest lands are *suitable* for winter recreation and should not pre-determine the eventual over-snow vehicle use map.

The percentages of land assigned to the various categories of ROS are listed in several places in the DEIS and draft forest plans. Unfortunately, the percentages listed are not consistent. This makes it impossible to evaluate whether or not the amount of land allocated to motorized versus non-motorized recreation will be in a reasonable balance. Accurate percentages should be published and the documents corrected. [DEIS, pp. 52, 468, 472, 475; Inyo FP, p. 40; Sequoia FP, p. 44; Sierra FP, p. 53].

Recommended Wilderness

Wilderness designation is the most effective protection that can be afforded our public lands. An important part of any Forest Plan revision should be the evaluation of existing forest conditions and adding to our inventory of candidate wilderness. Otherwise, another 15 to 20 years might go by without any forest lands being protected for future generations. We are pleased with the plan components that the draft plans specify how to manage recommended Wilderness areas, but we feel that the Forest Service should recommend additional areas beyond those listed in Alternative B. Alternative B recommends only 37,029 acres of Inyo NF and none at all for Sequoia and Sierra. Snowlands feels that the amount of recommended wilderness in Alternative B is unacceptably low.

Alternative C recommends 743,076 acres across all three forests, or twenty times the area recommended in Alternative B. This large disparity between Alternatives B and C makes it impossible to support either one. There should be an alternative defined with wilderness recommendations intermediate between Alternatives B and C.

While many of the areas in Alternative C are deserving of Wilderness protection, some contain infrastructure or recreation opportunities that are incompatible with Wilderness management. For example, the Golden Trout Wilderness Addition (southwest) polygon contain a popular climbing area known as The Needles. There is a high density of developed climbs in this area, most of which have bolted anchors and other bolts which require maintenance and replacement over time for public safety using power tools, which is not compatible with Wilderness management. The Forest Service should

work with conservation and recreation groups and identify the most pristine and important areas for wilderness protection and add those to the final Forest Plan.

The draft forest plans treat wilderness protection as primarily a recreation issue. While wilderness designation can affect the recreational uses of forest land, there are other, equally important considerations for wilderness designation. These include habitat and resource protection, biodiversity, and the simple fact that some portion of our planet should be kept relatively free from the impact of humans.

Pacific Crest Trail

Snowlands supports the management direction for the Pacific Crest Trail (PCT) specified in Alternative B. A one-half mile corridor on either side of the trail should be sufficient to maintain the generally non-motorized nature of the trail experience in the winter, even though it does not provide complete separation from the noise impact of OSVs.

The Draft EIS and forest plans should address winter recreation along the PCT. Winter and summer conditions are significantly different. Trail use is much less, and the trail is difficult to find or follow when covered with snow. Cross-country over snow vehicle travel within the PCT Management Area should be prohibited, except for designated crossing points. Crossing points should be clearly marked on motor vehicle use maps. The frequency of the crossing points should correspond to the limits established by the *Comprehensive Management Plan for the Pacific Crest National Scenic Trail* and the recreation opportunity spectrum assignments for the lands surrounding the trail. Guidelines for the frequency of PCT crossings should be added to the list of Standards and Guidelines for PCT management in the draft plans. The plans should emphasize that the noise of motorized vehicles, rather than the sight, is more of an impact in winter.

Standards and Guidelines

Earlier drafts of the three forest plans included a plan standard that established a minimum snow depth of 18 inches for cross-country OSV travel. We are disappointed that this standard has been dropped from the Inyo and Sequoia draft plans and downgraded to a guideline in the Sierra draft plan. All three final plans should include a Standard that sets a minimum snow depth of 18 inches for cross-country OSV travel. This standard is necessary to protect soils and vegetation, provide consistency in regulations as visitors travel from one forest to another, and allow management to adapt to changing conditions. A minimum snow depth will help ensure that forest resources are protected as snow conditions change throughout the course of the winter season.

During travel planning the Forest Service must locate designated OSV routes and areas in a manner that minimizes impacts to other uses. The 2005 Travel Management rule, including Subpart C, require compliance with the following minimization criteria:

(b) Specific criteria for designation of trails and areas. In addition to the criteria in paragraph (a) of this section, in designating National Forest System trails and areas on National Forest System lands, the responsible official shall consider effects on the following, with the objective of minimizing:

- (1) Damage to soil, watershed, vegetation, and other forest resources;*
- (2) Harassment of wildlife and significant disruption of wildlife habitats;*
- (3) Conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands or neighboring Federal lands; ... [CFR 36 212.55 (b)]*

These criteria should appear as Standards in the Forest Plans.

Conflict Monitoring

Forest monitoring should include the monitoring of user conflicts. The draft plans contain this desired condition:

REC-FW-DC(05) Conflicts between different recreation uses are infrequent.

However, there is no specific monitoring plan for measuring whether or not this condition is satisfied in the tables titled “*Visitor Use, Visitor Satisfaction, and Progress toward Meeting Recreation Objectives*” of the draft plans [Inyo, Table 13, p 120; Sequoia, Table 14, p 115; Sierra, Table 14, p 116]. There should be a plan for monitoring the success in achieving this condition.

Proposed and Possible Actions

Winter Travel Management should be added to the list of Proposed and Possible Actions for each Forest Plan.

Preferred Alternative

None of the four alternatives presented in the DEIS satisfactorily address winter recreation. Alternative B includes an acceptable management option for the Pacific Crest Trail but does not contain enough wilderness recommendations to protect important wildlands. The PCT management approach in Alternative C is unduly restrictive for winter conditions. The wilderness recommendations in Alternative C are probably more than should be considered for inclusion into the Wilderness system at one time and includes some areas that are not appropriate for wilderness designation. None of the Alternatives contain winter-specific Recreation Opportunity Spectrum categories or classifications.

For these reasons, Snowlands Network does not endorse any of the existing alternatives.

Conclusion

Snowlands recommends that the Forest Service develop a Winter Recreation Opportunity Spectrum map for each forest and publish the map as soon as possible. Because the public should be afforded the opportunity to evaluate and comment upon this map before the Final Environmental Impact Statement and Forest Plans are published, the Forest Service should release a supplemental Draft Environmental Impact Statement once the winter ROS maps have been developed with an appropriate comment period.

We also recommend that the Forest Service work with conservation and recreation interests groups to analyze the wilderness recommendation areas listed as part of Alternative C, prioritize the areas for their wilderness qualities, and include those areas in the Final Plans which are true wilderness and could reasonably managed and designated as Wilderness in the next ten years.

Lastly, the Forest Service should list Winter Travel Management as a proposed action in Appendix B in the plans for all three forests and determine a timely schedule for beginning this process.