

Inyo National Forest Travel Management – Step 4 Questions and Answers (11/9/07 version)

The following questions were asked by participants at the public information meetings held in Bishop on October 16th and Mammoth Lakes on October 18th. Questions are organized around the following topics:

- Public Involvement and the Environmental Analysis Process
- Criteria Used When Evaluating Routes
- Existing Baseline Road System
- Adding Unauthorized Routes to the System
- Motorized Trails
- Inventoried Roadless Areas and Management Prescriptions
- Public Use of Roads Off of National Forest System Land
- Funding
- Implementation
- Proposed Action Maps
- Other Questions About Forest Service Activities

Questions About Public Involvement and the Environmental Analysis Process

Who is going to do the EIS and what are their qualifications?

A – A team of Forest Service staff representing a variety of disciplines will be writing the EIS. Team members will have the expertise to identify and to evaluate the potential direct, indirect, and cumulative social, economic, physical, and biological effects of the proposed action and its alternatives.

Do you believe that the proposed action provides for a balance between competing interests in that it provides for reasonable access protections for wildlife and solitude? If so, please explain.

A –The proposed action was developed to fulfill the need to provide both wheeled motorized access to dispersed recreation opportunities and a diversity of wheeled motorized recreational opportunities on the Inyo National Forest. The proposed action must also achieve a set of purposes or objectives, such as avoiding significant disruption of wildlife habitat and minimizing conflicts between wheeled motor vehicles and existing or proposed recreational uses of NFS lands, and following direction, laws and policies governing these public lands. The purpose and need for the proposed action is described in the “Notice of Intent to prepare an Environmental Impact Statement”.

All reasonable alternatives to the proposed action will also fulfill the needs and objectives identified for the proposed action. The environmental analysis in the EIS will present the environmental effects of the proposed action and alternatives in comparative form, providing a clear basis for choice among options by the decisionmaker and the public.

How does the Forest Service expect the public to provide route numbers on the comment sheet if maps on the EIS CD does not show the existing inventoried routes nor route numbers?

A – The Proposed Action maps only show routes that would be in the system under this alternative. To facilitate comments on routes which are not on the Proposed Action alternative, the CDs now have “Inventory maps”, which show all routes, and have labels for all routes not shown on the Proposed Action maps.

Is a time extension on the comment period possible?

A – Yes. The comment period has been extended until December 15. However, scoping comments can be sent at any time prior to a decision.

Notice of Intent (NOI) language is purely anti-motorized language. Where did this come from? Will the EIS carry the same tone?

A – The NOI is based on a Regional template, and takes much of its wording from the National Travel Management Rule. It is not intended to have an “anti-motorized” tone. The intent of the project is to establish a stable, sustainable system of roads, trails and areas for people using motorized wheeled vehicles on national forest lands. Forest Supervisor Jim Upchurch will make the final decision about the motorized transportation system after considering all public comments and reviewing the analysis in the EIS. None of his staff have shown any kind of a bias against motorized recreation.

Are any more public involvement field trips planned?

None are planned at this time. If we receive comments indicating that more are needed desired, we will consider scheduling them.

What can the Sierra Club do to facilitate this process? We would like to see the process finished as soon as possible. We would not like to see an extension of time for comments on the draft, please.

A – Send us your comments on the proposed action in a timely manner. Your participation in the analysis process is the best way for us to fully understand the value of a route to you, or the role it plays in accessing places that are special to you.

Questions About the Criteria Used When Evaluating Routes

What criteria were used to determine whether to add a particular route to the system? Will they be outlined in the EIS?

A – The Travel Analysis Criteria are available on our website at <http://www.fs.fed.us/r5/inyo/projects/travel.shtml>. The analysis criteria will also be described in the EIS.

These criteria were used in making team recommendations for a proposed system of routes for the Inyo National Forest. The criteria are based on national guidance, and were modified and fine-tuned to local area needs by many members of the public.

Is the criteria matrix available? Does it have to be requested through a FOIA?

A – The criteria used to develop the proposed action are available on the Forest website. The individual criteria for each route cannot be disclosed in full, due to concerns with disclosing specific information about certain resources.

Will the public be given the reasons why a road is not proposed to be added to the system? Should public be encouraged to suggest mitigation? If the public can't know the reason for non-inclusion then how can they suggest mitigation?

A – The Forest will disclose all the information that we can about the routes. Certain sensitive information cannot be disclosed because of potential risks to resources.

Is it down to an individual having to ask FS staff one on one about a specific resource and why something is proposed for closure? Where is the disclosure here?

A – If specific routes are critical to reaching an important destination or opportunity, please bring these to our attention. If it is possible to mitigate impacts to other resources, the route could be considered for addition to the motorized Transportation System under one or more of the alternatives to the proposed action.

Is there a criteria for taking out redundant roads next to each other (for instance: less than ¼ mile going to same place over same terrain?)

A – Yes, there are criteria for duplicate/parallel routes. Routes are evaluated based upon terrain features and availability of similar opportunities in the same vicinity.

How was 'future manageability' taken into account to arrive at proposals for specific routes?

A – Manageability has been and will continue to be taken into account when proposing routes for public motorized use. In general, most of the proposed routes are low maintenance and don't cost a lot of money to maintain except in situations where resource mitigation is needed. The cost of completing any needed mitigation was taken into consideration before proposing a route for addition to the system.

Some of the rationale for a smaller system of routes is making it sustainable. How does the cost of sustaining the system compare with the cost of implementing closures?

A – Cost is a factor, but it is only one of many criteria used to evaluate each road proposed for addition to the system. The most efficient transportation system may not necessarily be the least costly.

Questions About the Existing Baseline Road System

How can a route with a number on it and that the Forest Service put a sign on be a non-system route? Seems that route has been sanctioned as part of the system. How has it not been documented as a public access route? (Refers to a route located on Wheeler Crest overlooking Bishop).

A – The numbering system on our maps and inventory – even those numbers which may resemble system road numbers – is designed for reference purposes for this project, and does not mean they are on the Transportation System. Signs or other markers placed by field staff do not necessarily indicate an active Forest decision to manage the road for public motorized use.

Why is the June 12, 2001 letter from Supervisor Bailey no longer valid? It certainly followed two route workgroups public processes.

A – Although Supervisor Bailey’s 2001 letter was preceded by a series of public meetings and workgroups, his determination about the status of roads on the Forest did not include an environmental effects analysis as required under the National Environmental Policy Act (NEPA).

NEPA applies to all federal actions including the action of designating new motor vehicle routes or areas. The responsible official and the public must be informed of, and consider the consequences of, route designation before a decision can be made. The 2001 letter was not accompanied by sufficient environmental analysis to support a decision regarding the designation of routes for public motorized use.

When the Inventory process started we were told that roads that had an “S” in the name were part of the system, and only the “N” roads were in question. There are huge amounts of “S” roads missing from the Inventory that have been removed from system.

A – The Forest actually never had routes referred to as “S” routes. Some system routes have either an “S” or an “N” in the middle of the road number, which represents “South” or “North” township on Forest Service maps. Some non-system routes were indicated by an “N” at the very start of the number. The Forest encouraged the public to focus primarily on these routes during steps 1 and 3 of this process, though we received many comments on other routes. Due to changes in the baseline system, the Forest has now coded all non-system routes with a “U” (for unauthorized). Now is the time to comment on these routes.

Questions About Adding Unauthorized (Non-System) Routes to the Road System

Are user-made roads included in the total of 2,165 miles (of system and non-system roads) in the proposed action?

A – Yes. The proposed system would add approximately 925 miles of existing unauthorized (non-system) routes to the current system of 1,240 miles of National Forest System (NFS) roads. The unauthorized routes proposed as part of the system are generally well-sited, provide excellent opportunities for outdoor recreation by motorized and non-motorized users, and would enhance the National Forest system of designated roads, trails and areas.

If the FS makes “legal”, i.e., adds to system inventory, routes that were created illegally, how will the FS mitigate for the impacts created by adding illegal routes to the system?

A – Technically there are no ‘illegal’ routes, as the Forest has not restricted public motorized use to a specific system of routes. Nevertheless, some unauthorized routes, including some that may have been created by recreationists, are well-sited, provide excellent opportunities for outdoor recreation by motorized and non-motorized users, and would enhance the National Forest system of designated roads, trails and areas. Other unauthorized routes are poorly located and may cause unacceptable impacts.

Questions About Motorized Trails

Why the 50” wide limit for [motorized] trails? Make it a single track or dual.

A – The 50” limit stems from Forest Service Manual definitions for trails, as compared to a road. The Inyo NF proposed action proposes trails in two classifications – single-track for motorcycle only, and trails less than 50” for motorcycle and ATV use.

Will you please consider the creation of a 4x4/ATV/motorcycle trail classification for wide yet challenging routes in the Forest?

A – Trail definitions allow us to designate some trails exceeding 50” in width if they are managed for “trail vehicles”. These would have different characteristics than a “road”. The Forest could consider such designations if the public brings specific, appropriate routes to our attention.

What would be required to change the 50” trail width definition as a major factor in route access?

A – If you believe some routes would be appropriately managed for trail vehicles wider than 50”, please specify these routes and types of vehicles in your comments.

I understand that the FS can designate a “trail” in an [Inventoried] Roadless Area (IRA) to be managed for full-sized vehicle use. Is that true?

A – Motorized trails can be designated in IRAs, as long as they are managed as trails for trail vehicles. This could include licensed street-legal vehicles that are intended for extremely rough surfaces.

Can a street legal Bronco use a trail?

A – Yes. See above.

Will there be a route designation for 4 wheel drive trails, say 80”, or jeep trails not for full size 4x4s?

A – The proposed action does not propose trails designated for vehicles greater than 50” wide such as jeeps or full size 4x4s. However, we can consider designating routes as motorized trails for jeeps or full size 4x4s if the trail will be specifically managed for “trail vehicles”.

Since Green Sticker OHVs are not allowed on county and state roads how will those on the Forest, such as the Obsidian Dome Road, be dealt with?

A – When a county claims a road or portion of a road they have responsibility for it and are subject to the California Vehicle Code. This means they can’t allow use by non-highway vehicles. However, all types of vehicles may be allowed on portions of the road managed by the Forest Service. Technically, users would need to trailer non-highway legal vehicles to the Forest Service portion of the road, rather than ride the vehicle on the county or state road.

Questions About Inventoried Roadless Areas (IRAs) and Management Prescriptions

What is the rationale for determining the status of routes in Inventoried Roadless Areas (IRAs)?

A – Original boundaries of Inventoried Roadless Areas (IRAs) were drawn in the 1970s under the RARE II (Roadless Area Review and Evaluation) study. When the Forest Plan was completed in 1988, some IRAs were identified as Proposed Wilderness (Management Prescription #2), while others were identified as Semi-Primitive Recreation (Prescription #17) or Multiple Resource Area (Prescription

#18). These prescriptions had different direction regarding roaded access. For example, road construction and reconstruction were prohibited in Proposed Wilderness, but allowed in Multiple Resource Areas.

Currently, however, the Forest Service has been directed to comply with an order issued by the United States District Court for the Northern District of California which prohibits the approval or authorization of any management activities in IRAs that would be prohibited by the 2001 Roadless Rule. The 2001 Roadless Rule prohibits most timber harvest and road construction and reconstruction activities in all IRAs, regardless of the prescriptions assigned to those areas in individual forest plans.

Because designating or adding unauthorized routes to the forest transportation system falls within the definition of road construction used by the 2001 Rule (“Activity that results in the addition of forest classified or temporary road miles”), the Forest Service currently cannot designate unauthorized routes within IRAs through the Travel Management process. Limited exceptions apply, such as when a road is needed to protect public health and safety from threat of flood, fire, or other catastrophic event.

How many miles of non-system roads are in Inventoried Roadless Areas (IRAs)?

A – About 350 miles of non-system (unauthorized) routes are actually within IRAs, but an estimated 400 miles are potentially affected by IRA boundaries.

How accurate are the IRA boundaries shown on the EIS CD maps?

A – IRA boundaries on the Inyo National Forest were drawn during the Roadless Area Review and Evaluation (RARE II) study of 1979. Precision of the IRA boundaries varies due to differences in map accuracy available in the 1970s, as well as conversion of the original hand-drawn boundaries to digitized data in the 1990s.

The IRA boundaries shown on the proposed action maps were extracted from the national dataset on the Roadless Area Conservation website at <http://roadless.fs.fed.us/documents/feis/data/gis/coverages/index.shtml>. The IRA data were originally submitted by all national forests through their Regional Offices for the Forest Service’s Roadless Area Conservation Initiative. IRA boundaries shown in the current national dataset are those which the Forest is directed to use.

Are all non-system routes in IRAs proposed for closure? If not how many miles are proposed to become system roads.

A – The Forest Service has been directed to comply with an order issued by the United States District Court for the Northern District of California which prohibits the approval or authorization of any management activities in IRAs that

would be prohibited by the 2001 Roadless Rule. The 2001 Roadless Rule prohibits most timber harvest and road construction and reconstruction activities in all IRAs, regardless of the prescriptions assigned to those areas in individual forest plans.

Because designating or adding roads to the forest transportation system falls within the definition of road construction used by the 2001 Rule (“Activity that results in the addition of forest classified or temporary road miles”), the Forest Service currently cannot designate unauthorized routes within IRAs through the Travel Management process. Limited exceptions apply, such as when a road is needed to protect public health and safety from threat of flood, fire, or other catastrophic event.

Spurs that run to the edge of an IRA and stop – will the spur also be closed/removed?

A – Give us site specific feedback if you have issues or concerns with a particular spur. Spurs will be evaluated for public motorized use using the same Travel Analysis Criteria as other routes.

Why are roads in semi-primitive recreation areas not included as proposed [in the 1988 Forest Plan]? In some cases these have gone through rigorous public involvement.

A – Please let us know which roads you are specifically concerned about. The purpose of the Semi-Primitive Recreation prescription in the 1988 Forest Plan is to limit vehicular access to existing designated routes to protect and maintain recreation and/or wildlife values (Forest Plan, p. 147). As a result, the proposed action does not add additional roads in Semi-Primitive Recreation areas that were not previously designated as part of the forest transportation system.

Questions About Public Use of Roads Off Of National Forest System Land

Many routes traverse both USFS & Bureau of Land Management (BLM) managed lands. How does the USFS process address issues that cross the BLM/USFS boundary? How do the USFS & BLM processes involving routes work together?

A – BLM and FS staff share information and data about the status of the Travel Management process on a regular and on-going basis. The BLM is responsible for managing a system of routes on BLM lands, and is working with us to ensure our systems will be compatible.

Is the Forest Service cross-checking the status of routes where routes on the Forest cross on to BLM or other jurisdictions, so one isn't open on Forest and then closed on BLM or vice versa?

A – Yes – we are working closely with the BLM to coordinate those types of issues.

What happens when a route crosses private property like up in Coyote?

A – In order to designate a route for public use on private property, we must have documentation of rights of way, or at a minimum, implied permission of the landowner. Routes that cross private property will not be proposed for public use if a private property owner has put up gates, posted “No Trespassing” signs, etc.

What about private property? Are we coordinating with land owners?

A – Routes on private land are proposed for public use if landowners are willing to allow public use of routes which cross their land (e.g., DWP land). However, we are not designating routes on the ‘other’ side of a private parcel.

Questions About Funding

How is the Environmental Impact Statement (EIS) being funded and what is the projected cost?

A – Funding is provided through the State OHV and Forest Service funds. SBC 742, which earmarks some funding toward California Forests’ Route Designation planning efforts, has just been signed by the governor. No exact cost for the Inyo National Forest’s EIS is known yet.

Questions About How the Decision Will Be Implemented

You are looking at closing a significant amount of routes – how will they be closed? Will routes be obliterated?

A – This process will designate a system of routes that are available for public motorized use. Site-specific analysis and decisions about any physical closures or management as non-motorized trails will follow once the system is designated.

Why isn't the cost of implementing the process included in the EIS?

A – Estimates of costs for transportation system management will be disclosed through the EIS process.

Once a trail is decided to be closed, how is that going to be done?

A – The goal of the travel management process is to designate a system of roads for public motorized use. Following a decision on this proposal, the Inyo

National Forest will publish a Motor Vehicle Use Map (MVUM) identifying all INF roads, trails and areas that are designated for public motor vehicle use. The first step in implementation is likely to include the posting of signs so the public knows which roads are available for public use.

Decisions about how to control access to a particular road or area will be made through a subsequent analysis process. If ground disturbance is needed to control access, e.g., ripping the road, the effects of that action will need to be analyzed and disclosed to the public through the National Environmental Policy Act process. In some cases we may need to complete rehabilitation work. SB 742 funds will help with implementation.

Questions About Proposed Action Maps

How can we get copies of the full size maps?

A – All proposed action and route inventory maps are available on compact disc. Sections of the maps can be printed to 8½ x 11 inch paper; printing full size maps would require use of a plotter.

We do have some ‘rent-a-sets’ of the full size maps available for use by the public. Please contact Marty Hornick at 873-2461 if you would like to borrow hard copies of the maps. Full size maps are also available for review at the Forest Service visitor centers in Mammoth Lakes, Lee Vining, and Lone Pine, the Forest Supervisor’s Office in Bishop, and the Bureau of Land Management Office in Ridgecrest.

There is at least one example of where ½ of a road was removed – and now the proposed action leaves a spur ending downhill on a steep slope.

Wouldn’t it make more sense to remove the entire segment or leave it in? I prefer it be taken out.

A – Please let us know if you find such situations when reviewing the maps. This is the time to help us identify mapping errors or to add to our knowledge of the nature of the road.

The Mammoth West map is missing on the CD released with the proposed action.

A – The new CD (10/22/07 version) will correct that oversight and will include updated route inventory maps as well as the proposed action maps. Inventoried Roadless Areas are shown in purple on the maps.

Are we working with USGS to correct their old maps?

A – No. The USGS has a separate process for revising and updating its maps.

Other Questions and Concerns

How will this process protect or preserve the historic wagon roads? Are these roads covered by the Antiquities Act?

A – The route designation process will be conducted in compliance with the National Historic Preservation Act and other relevant laws and regulations. Historic roads may be designated for continued public motorized use depending on the potential for damage to cultural resources. Your site specific information will really help us to know which roads are of interest or concern.

How will this plan affect our ability to cut and load our wood – such as when we have to drive off a road in a wooding area to our wood?

A – With a fuelwood permit you can drive to get your wood once you have cut it. This process will not lead to any change to the current situation.

I'm a Mammoth High School graduate from the late 70s. We rode our green sticker dirt bikes to school which was never a problem for the local sheriffs or highway patrol. Is it possible by starting a motorcycle club, for education reasons, could we reserve to ride the Mammoth Motocross Track?

A – While there are maintenance, operation, safety and enforcement concerns associated with keeping the motocross track open to the public, Mammoth Lakes District Rangers are willing to work with interested groups to consider other options. (Note: Future use of the Mammoth Motocross Track is not being considered as part of the route designation process.)

How do you classify tracked vehicles that are over the snow?

A – The Travel Management process will only designate roads for wheeled motorized use. Use of roads by over the snow vehicles will not be determined during this process.

Will there be a national or regional process for non-motorized [access]?

A – We don't know at this time if a similar process will be conducted for non-motorized access. There will be opportunities to address non-motorized opportunities locally when the travel management process is complete and the Inyo National Forest has a defined system of roads designated for public motorized use. A current regional effort related to mountain bike trails is focused more on the design of such trails than the designation.

Can we provide comment on trailheads?

A – Absolutely. However, some comments not specifically related to routes for public motorized use may not be a part of this analysis.