



May 18, 2015

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CC: comments-pacificsouthwest-inyo@fs.fed.us, earmenta@fs.fed.us

**Re: Comments on Inyo National Forest Draft Travel Analysis Report**

Dear Travel Analysis Team,

On behalf of Friends of the Inyo and the Sierra Club, we would like to thank you for the opportunity to comment on the TAP (Travel Analysis Process) and DTAR (Draft Travel Analysis Report) with general and route specific comments. We are proud to work with the INF and commend you for being one of the first California National Forests to complete a DTAR. This is an important step, of many, towards putting our Forest's road system on a trajectory towards sustainability and manageability. Friends of the Inyo and the Sierra Club were integral players in the 2009 Travel Management (TM) Decision, providing both place based comments and, the case of Friends of the Inyo, helping with implementation.

Friends of the Inyo's strategic plan specifies that we will defend the decisions made during Travel Management because of the hard work and compromise citizens put into the process. We are an organization that recognizes the importance of roads for recreating on our public lands. We also want to make sure decisions for routes make fiscal and ecological sense, and that management is backed by on the ground site visits. Board, staff and volunteers spent the last 30 days visiting many of the routes analyzed under the TAP.

We hope our route specific comments and photos (photos of some routes are included in this report and are provided to INF via flash drive to incorporate into the database) will help strengthen the final report and inform any future management decisions. In the instance where photos of the route were taken, they appear at the end of the narrative on the associated route.

**General Comments**

Dozens of current routes in the system are non-existing, especially in the North Zone

where FOI has been monitoring routes closed during TM. These routes were provided during the 2014 reporting year to INF. During the public meeting in Bishop we recommended the INF look into whether they had used that information in the DTAR. We hope you will use this data and take the extra step to remove these routes from the system with a Categorical Exclusion. Removing routes that are part of the system but not drivable is one step in the process of achieving a minimal road system. We would like to see federally appropriated funds be proportional to the level of use, except in the cases of wildlife and aquatic areas, which require special consideration and prioritization. Appropriated funds should also include money for monitoring, not just maintaining high use routes and those with special biological risks. We know it is not current USFS policy, but one method of balancing the road maintenance budget would be to allocate a small percentage of timber (KV fund) and fire (is a word missing here?) to road maintenance. These projects and activities directly impact the quality of the road system, yet these programs do not pay for repair or maintenance when impacts occur. The DTAR discusses County roads through USFS land and the need for a management agreement or MOU for route maintenance. Many level 3 and 4 roads through USFS land are maintained by the county. The county does not maintain for resource protection or recreational use and maintenance is sometimes in conflict with forest uses. One example of these conflicts is the county's grading (grading?) of roads which create high berms, which then block access to dispersed camping sites on USFS land. We support the idea of INF and counties entering into a MOU or management plan for the maintenance of these roads. Such an agreement will also help clarify who is responsible for what roads.

We recognize the limited time and resources the agency has to analyze the road system, however we believe the DTAR is missing some crucial pieces. We recognize the DTAR is a living document, linked to a database to be updated as needed. However, because of changes in road condition since 2003 and 2009, the DTAR should analyze all roads. Secondly, The DTAR needs to look at the larger picture of the route system in its entirety. This means considering road density and redundancy in risk/benefit calculations. Thirdly, The DTAR should also incorporate Critical Aquatic Refuge's (CARs) into the risk analysis. It is well known that CARs provide habitat for Threatened, Endangered and sensitive aquatic species. Fourthly, roads with proximity to inventoried cultural sites with documented vandalism and looting should be considered high risk (-2 rating). Damage to cultural sites is a serious, unmanaged problem on the INF and roads to these areas pose a direct risk.

The analysis and report include the dramatic traffic increase and resultant impacts of newly signed loops and routes marked on the ground and advertised via the free CTUC maps. Routes such as those along the Crater Loop (01S07 are a perfect example) which prior to signing and advertising were largely regular two-tracks through the Forest accessible by all types of vehicles. These routes now have 2-4 foot high whoops, banked curves and other terrain features caused by the repeated

passage of knobby tires over loose soils at thigh rates of speed. These signed routes are predominately level 2 routes, and given their increased use will require a dramatic increase in maintenance spending to ensure their continued use.

Roads that access areas of frequent trespass should be considered high risk (-2 rating). Likewise there should be an assessment of the feasibility of successfully maintaining closures on that are determined to be 'likely not needed.' Friends of the Inyo's field visits to routes "likely not needed" involved such an assessment. We learned through TM that some routes simply cannot be successfully closed due to where they are located and the use they receive. Time and resources are better spent on routes that will not be continuously 'reopened' by the public.

We strongly support the TAR conclusion that this process and resultant report are simply "a starting point for future planning projects." Site-specific planning projects, which review a given set of routes in a finite area for a distinct purpose (recreational enhancement, wildlife habitat restoration, watershed health) form the backbone of sustainable motorized recreation management and should be continued as resources allow. This is especially true, as the TAR points out, for area with high road density areas such as the Jeffrey Pine forest and Casa Diablo.

Finally, to ease future public commenting on the roads issue across the Forest, the Forest should maintain the "Focus Area" concept and delineations that were developed during TM. Focus areas provided the public distinct sections of the Forest to comment on. Lacking a common nomenclature to break up the Forest, process like this can be overly daunting and incomprehensible. A good example of how this might be done across the Forest is that of the Coyote area which was included as a stand-alone area in this process. Our goal was to survey as many routes as possible, focusing on high use areas and those that have potential risks to roadless/wilderness values and biological resources.

### **Route Specific Comments**

*Whites- 4/29/15*

09S110B- This is an unsigned route is directly off of Hwy 168 and ends at campsite and vistas of Sierras, Whites and Owens Valley. Campsite is at a saddle where hiking opportunities to high points north and south exist. There is some trespass south of campfire ring, and there are motorcycle tracks off route down to the west of campsite. There is some trespass near the beginning of the route. The route has moderate erosion. Given the use of this route and the campsite/hiking access we recommend this route as needed.



White Mountain Road

08540E- green gate was closed on 4/29/15 the route looked near level 3 condition and well travelled

04S01A- not listed on grid

08S40G- route is unsigned and we were unsure if we were on the correct route.



04S01Q- steep and short route to top of ridge, has views. looks well travelled

04S01R- at 0.4 miles road peters out to be virtually undistinguishable between openings in PJ forest. Road is little used, no campsite or fire rings seen. first 0.1 mile is on steep side slope with erosion risk. recommend not needed



Sliver Canyon Road-

06S02P- Could not locate route. none existent?

06S02K- goes to a campsite and powerline access



06S02J- goes to nice campsite, also has scientific collection station. Recommend needed





06S02H- next to powerline, goes to a pullout, well used but not 0.10 miles long



06S02G- crosses riparian and creek to access silver canyon, ends quickly. high risk to riparian. photos 13/14. Recommend not needed



Impacts to desert bighorn sheep needed to be considered along Sliver Canyon road. New lambs were seen in the riparian of the canyon on 4/29/15.

*Whites 5/7/15*

07S131- We walked about a mile/mile and a half up this road, but not up to the end. It rises steeply from the highway, and then leads through a high basin. We observed some light usage on the road (tire tracks), but no major campsites, spur roads, trails, or other obvious reasons other than that it was secluded and quiet. Down low, the road is gradually eroding, but it appeared well built back in the day, so it's still in good shape, although it has smooth, sharp rock that makes for rugged travel. There is opportunity for trespass, but there was no evidence that this has occurred. Recommend likely needed.



07S13A- We drove this road until a couple of trees made it hard to get the truck through and walked the rest. People are riding it. There is an old, small mine up there. It's unclear where the official road ends. The result is that there are braided use roads continuing through the forest. We tried to determine what was official



road, but pinyon have grown in. We didn't observe a ton of use continuing past this point, however, there were a couple of faint tracks driving up the wash in the bottom of the canyon. Recommend likely not needed. Particularly if there's no way to clearly mark where the road ends to detour traffic further up the drainage, so this route poses a clear trespass risk.



07S13B- This route is unsigned. If in fact this is the correct route, we came to a point where the canyon gets deep and tight, and the main road is in poor shape. This is the point on the main road where we turned around. I had noticed what appeared like a faint road spurring off before the canyon so we checked it out. It was unclear which route was which. The route gets you around the difficult to pass canyon section, although it's really steep and probably can't do it in a truck. It's clearly created by use, by riders bypassing the canyon. It's not an obvious route from the main road, and it didn't appear that a lot of riders are using this route, however, it's on a side hill, and its user created. Consider downgrading to a motorized trail.



*Mono Lake Area- 5/13/15*

02N21- Recommend not needed. This route is very erosive.

02S43 - Recommend not needed, but this will make 02N47 a dead end route. As a general rule, creation of dead end routes should be avoided, as dead end routes invite proliferation and trespass.

03N02 – Recommend needed. This route accesses the mysterious location signed as Deep Wells. This route is in a low density area with few motorized intrusions and should be maintained. The top of the route offers great views Mono Lake and surrounding area.

01N52A - Recommend needed. This route east from Navy Beach accesses a popular remote parking area, and, we believe, is actually maintained by State Parks.

*Mono Craters- 5/14/15*

01N26 - This route is proliferation nightmare. Strongly recommend as not likely needed

01S18 - This route is proliferation nightmare. Strongly recommend as not likely needed

01S94 – We question the validity of the "not needed" finding. This route is popular for sledding/skiing access early and late season into the Mono Craters. To reduce the high road density in this area, the Forest should recommend 01N24 - the parallel route 1/4 mile to the east - as not likely needed. This route has much lighter use than 01N94.

*Glass Mountains 5/15/15*

01S17G - This route provides access to a stunning vista point overlooking the Long Valley and a superb campsite. The route shows no resources on erosion problems. We recommend this route as likely needed.

01S17S - This route doesn't exist on the ground. Recommend not needed.

01S96- This route is listed as likely needed. Why? We strongly believe this route needs to be put to bed and left alone. This route, as shown in the below photo, is completely overgrown. Also, this route illustrates another example of where removing an adjacent route, in this case 01S93 (which is rightly shown as "not needed" since it is unfindable on the ground!) inadvertently creates a dead end route problem. Recommend not needed.



#### *June Lake Area*

01S24- This route north of Parker Meadow and south of Little Walker Lake has been closed for decades. Last summer an ACE crew and Forest staff spent over three days restoring the route over much of its length. We strongly do not agree with the 'likely needed' finding- this appears to be a data error. Please remove this route from INFRA as a designated route.

#### *Antelope Springs- 4/30/15*

03S05T- superfluous route to a camp area in an area with a plethora of dispersed camping areas. Recommend not needed.

03S60A- First 0.1 miles is used and sandy. After that there is little to no use, deep pine duff, then grasses and sagebrush growing in (photo). Just before end is a large downed Jeffrey blocking the route, beyond that the route is almost non-existent to a



dead end area in sagebrush/Jeffrey forest. Recommend not needed.



03S60C- photo 4- north end of route, photo 6 south end of route. This is a well used route with nice views and valley and range, skirts ridge. A large Jeffrey has been cut out very recently. Recommend needed. Of other note, off of this route is an open closure at GPS location 332448.64, 4.69726.4, log has been moved, the closure on the opposite side of route is still intact.







3S41A- This route travels to top of hill first thru Jeffery then sagebrush and pinyon. At top is a RAWS or remote data collection area. The route appears little used except for the purpose of accessing the data collection site. One section of the route does go through a substantial obsidian source site with worked pieces. Road probably requires little maintenance. Recommend likely needed.

03S43B- Unnecessary spur route climbs hill. Recommend not needed

03S146 (south spur). Route goes through prime sage grouse habitat (west end of route) route turns and borders fence. If fence is not active or needed, this route may not be necessary. This road may have been originally made for fence maintenance.



03146A- An unsigned route that goes to top of knob with pines and ends.  
Recommend not needed.

03S146B- This route has no tracks at end and leads to nowhere. It may have once been access to hot creek from north side at fenceline. Recommend not needed.



03S146 north spur- this route doesn't go anywhere except to connect 03S145 which ends at 03S146 south, which is the other part of the entire route recommended as not needed. this route goes through prime sage grouse habitat and accesses the north side of hot creek, but probably isn't really needed given it is a long loop back out to the antelope springs rd. from 03S145.



03S146C- goes to a pull out with foot access to hot creek. Another route is west of the fenceline and doesn't go anywhere. One of these 2 routes should be recommended not needed as they are side by side.

03S07H- rough 2-track that connects 03S07 to 03S60, bottom of steep section has a dismantled closure with motorcycle use. Recommend not needed.

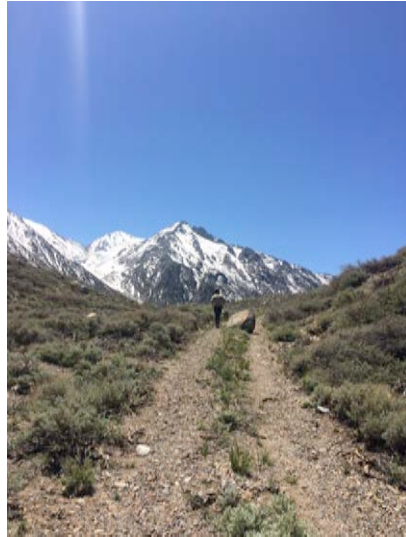


03S07J- could not be located. TAR appendix indicates this route is matrix 9 and not drivable.

03S141C- could not be located. TAR appendix indicates this route is not drivable.

*McGee Area- 5/10/15*

04S046D- Goes up McGee Mountain off of the McGee Road just before the sharp turn in the road. Road is decent and seems like it's getting used, at least until the second switchback. Above that there are no places to turn around and a large boulder is blocking the road to all but motorcycles. Road is off camber cut into a steep slope, and the shale above the road is sliding into the road in places. It appears to go to a saddle overlooking McGee Creek Canyon, but we didn't make it to the end. Above the second switchback, this road would be hard to maintain and is scary in places with a high amount of erosion potential and risk. Recommend likely not needed.

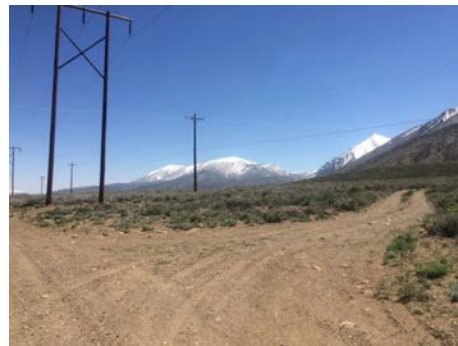


04S5??? & 04S49- They are spurs off of the zig zag road that goes up the north side of McGee (04S48). These may be old mining roads, but there are no campsites or anything of real interest. Recommend not needed or convert to motorized trails.

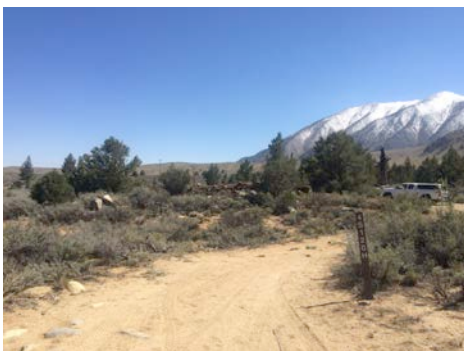
04S105-Services a cattle trough (below the proposed unnecessary section) and leads up to a lookout above the Tobacco Flat Road. Lots of evidence of deer. Seems



to be a destination for hunters. One section has a short series of five or six humps and dips probably caused by someone losing traction in the sand. Recommend likely needed.



04S120K- Could not locate route from below. Campground locked from above. It looks like it could be a decommissioned loop of a campground or a connector road. Did come across two short roads 04S120G and 04S120H that don't appear on the map but are signed. There is what appears to be a single track used by either mountain bikes or dirt bikes that is marked with blue flagging that runs in between these and goes on in both directions. Both the marked routes lead to dead ends. One (H) may be used as a campsite. There is a dead animal, probably a dog that was wrapped in a utility blanket and dumped in what might have been a tree well or a fire pit. These roads may have once been used for tree thinning, but they're deteriorated and only go less than 200 yards. Recommend likely not needed



N Barlow Ln | Bishop  
Western Sierra's Public



*Buttermilk Road area – May 12, 2015*

The Buttermilk/Starlight area is almost totally unmanaged for recreation and is complicated by a matrix of land ownerships. This is a motorized play area where any 'likely not needed' routes will be highly controversial.

07S04D- tiny spur which goes nowhere, recommend likely not needed

07S106, route is steep and loose. Redundant due to parallel open roads.  
Recommend likely not needed

07S01 and 07S01A- These routes are currently used and pose little risk.  
Recommend likely needed.

07S104- currently used and poses little risk. Recommend likely needed.

07S109 and 07S109A- The A spur has a loose unstable section and leads to a creek crossing that goes to Starlight. The routes do not actually access any destinations and receive little use. Recommend likely not needed.

08S101, 08S101D, and 08S101E- These routes receive heavy use and access a popular bouldering area. They appear to be in good condition and pose little risk, other than they penetrate the Grouse Mountain roadless area. Recommend likely needed.

07S01T- This route leads into the burn area. It is not signed and has no signs of recent use. Recommend likely not needed.

07S01V- This route may have already been closed in 2009 TM decision. A previous closure has been circumvented. Loose, steep, and short. Doesn't go anywhere that can't be accessed by another route. Recommend likely not needed, if in fact this route has not be previously eliminated from the system.

07S113, 07S116A, 07S117 (Warm Springs road routes). These were not surveyed in the last 30 days but we believe these routes have no particular risk factor. They are very close to the motorcycle pit off of South Barlow, and would be very difficult to manage if closed therefore we recommend these routes as 'likely needed'.

*Glacier Lodge Rd.- 5/12/15*

09S21S- No evidence of recent use. Route may have been the old road to the powerline, however a new road to the east now services the powerline. Recommend likely not needed.



10S101A (west of crater mountain)- This road was very recently closed and is the only possible match to #10S101A. There appears to be nothing of concern in the entire area except a spring on private land to the west of here. Recommend likely not needed. If the route really is a closure, please remove this route from INFRA as a designated route.



*Shannon Canyon- 5/13/15*

08S105A- A spur that parallels the main road. The route looks like it may have gone to a mining claim or cabin at one time (photo below of debris). Recommend likely not needed.



08S105B- This road begins on BLM land and is therefore a bit complicated. It ends at a campsite. This road varies from good to rockier but passable. The first photo is the middle. The second is the near the end where it hairpins back onto FS land. The last is the beginning of the route on BLM land. Recommend likely not needed.







*South Sierra -5/10/15*

17S01- From the residences on Carroll Creek Road drive south on the power line road 0.4 miles and turn right on 17S01. There is no route sign or Inyo NF boundary marker. Road is in good shape with no damage. There was sign of recent vehicle travel (tracks). At 0.8 miles there is a small square fenced corral on right. The route for 0.25 mile past the corral is steep and then erosion has flowed down covering half of the route. There was no sign of vehicle use from where the route was turning into a narrow side hill. There is an old abandoned (cut) 1 inch PVC water line following the road up the canyon. The canyon is immediately north of the microwave switchback road. Just 0.1 mile below the corral a little used (no tracks, developed vegetation) route comes up from below to the south of 17S01.



17S01A- On Cottonwood Canyon Rd. immediately after passing the Inyo NF boundary sign this route goes off to the left. There is no route number sign. The route immediately forks. Vehicle tracks travel left in BLM lands. To the right on Inyo NF land there were no vehicle tracks and vegetation was filling the center of the route. It is only 0.1 mile long with no camping site or fishing location – a dead end. The upper end of 17S01A is blocked from reconnecting with Cottonwood Canyon Rd by two large rocks and bladed up road debris.



Cartago 19S01- Turn right, traveling south, off Hwy 395 immediately before the digital highway speed sign – shortly before the Cartago town sign. Follow this road up and across the Los Angeles Aqueduct. Immediately turn left and drive on the LA Aqueduct (LAA) access road on the west side of the aqueduct for 1.1 miles. There is a sharp curve in the LAA and 19S01 appears to be a portion of the LAA access road on Inyo NF land. On the right at 1.2 miles is a restored route into wilderness covered by rock and blocked with boulders. Carsonite wilderness boundary markers are visible.



Walker Creek - 0.0 miles is set at the Los Angeles Aqueduct. The Inyo NF boundary sign is at 2.8 miles.

a. 19S01A

Route 19S01A is at 3.6 miles and has a route sign. It is a dead end and about 0.1 miles long. There is a good turn around and there were beehives set out at the end of the route. The route crosses a stream (dry) that has been armored with rock in the past. No sign of damage on this route.



b. 19S01B

Route 19S01B is at 3.9 miles. It is signed and dead ends at a campsite after 0.2 miles. Quads were present. The route crosses a seasonally wet water birch and oak low spot. There had been restoration work in the past with brush and rock to cover where vehicles had been cutting the route. The route had no visible recent damage.





Thank you again for the opportunity to comment on the DTAR and for your thoughtful consideration of these comments. Thank you to Inyo National Forest staff for your continued work to sustain Forest health and enhance public use and enjoyment of their public Forest Lands. We agree that partnerships have and will continue to be essential to providing maintenance to routes that access public and private land. We look forward to working with staff and other local organizations to help the INF achieve its goal of a sustainable road system. If there are any questions about the comments found in this letter, please contact Jora Fogg at 873-6500 or [jora@friendsoftheinyo.org](mailto:jora@friendsoftheinyo.org).

Sincerely,

/S/ Jora Fogg  
Friends of the Inyo  
Preservation Manager

/S/ Frances Hunt  
Sierra Club  
Eastern Sierra Organizer