

## Comments on Los Padres Ground Operations Grant Application

We support this application for OHV grant funding to maintain the OHV Ground Operations of the Los Padres National Forest. This is a very large area with diverse opportunity for many forms of recreation as well as OHV that receives tens of thousands of visitors every year.

### Program Expenses – page 5-6:

The application should be updated to include work done as match by volunteer equipment operators and the CCC on the SLRD in Jan-March of 2012.

The Forest currently does not regularly employ trail equipment operators, other than when Fire staff and dozers are occasionally available. We have requested grant funding to allow hiring of Forest Service equipment operators from other Forests during the off season in an attempt to address this need. We believe this may be included under the “SLRD OHV/Rec specialist” staff expenses line item but it is not clear.

Although the funding request for Forest specialists is reasonable it can be challenging to find available specialists to actually do the work. Forest biologists have very limited availability due to multiple demands on their time. This is also true for archaeology, hydrology and soils specialists. This may become even more of a problem with possible future limitations on the use of NEPA categorical exclusions. We contend that at some point the Los Padres will need to contract with outside specialists utilizing grant funding in which case these costs may be higher.

It would be helpful to have more detail as to how the item “MPRD and SLRD OHV/Rec Specialist” will be allocated. This item makes up a significant portion of the requested grant funding. We recognize that allocations within this category need to be flexible and that a strict line item budget would be difficult to work with, but more detail would provide greater transparency as to how these funds are spent.

Regarding wet weather closures, we would like to point out that much of the Forest is subject to extended wet weather closures. The MVUM for the MPRD and some other areas of the Forest, with the exception of Ballinger, indicate use is allowed from May 1 - November 1. We don't believe this qualifies as a limited wet weather closure period as stated in the application.

### Contracts – Page 7

The closure of Rattlesnake Road and much of the Colson area due to severe storm events last year have made the Brookshire and Horseshoe Springs, and Wagon Flat campgrounds relatively inaccessible. It seems doubtful that it will be possible to carry out maintenance and vault pumping of these facilities. We support efforts to maintain these facilities in the hope that they will eventually be made more accessible. These areas are highly important to local residents.

### Materials/supplies – page 8

The application should state how many fire rings the MPRD plans to replace. At present this item for \$7000 does not provide any detail.

### Direct Expenses – page 11

Staff expenses make up approximately 73% of the grant request. The Forest supplies approximately 27% as match. We recognize that staff expenses are usually the largest single expense of any business or government operation, but the proportion of funding from grants is an example of how OHV recreation has become heavily subsidized to the point where many OHV programs are almost completely dependent on state OHV grant funding. With dwindling Forest Service budgets it seems unlikely that this trend will change anytime soon. Greater federal support of OHV programs would certainly be welcome and appropriate.

Bruce Witcher,  
Central Coast Motorcycle Association

## Comments on SLRD Planning Grant

We support this application for a Planning Grant by the Santa Lucia Ranger District of the Los Padres National Forest. We wish to add background information not included that we feel will strengthen this application.

This grant proposal would fund the continuation of several years of cooperative effort between volunteers and the Forest Service to improve the Pozo - La Panza OHV trail system. This grant would fund implementation of several recommendations made by Trails Unlimited as part of an assessment of the trail system conducted by this firm in 2011. The full report is available upon request.

### Trails Unlimited Assessment Findings:

1. 25% of the trail mileage appears to be in good condition and would require no immediate work to bring it to an acceptable standard.
2. 10% of the trail mileage should be considered for relocation to a more sustainable alignment.
3. 65% of the trail mileage would require utilizing new OHV maintenance techniques to bring it to an acceptable standard by changing the maintenance techniques currently used.

### Trails Unlimited Recommendations:

1. Develop a management plan for the area, including Trail Management Objectives, maintenance practices, operations, enforcement, signing and public information.
2. Begin implementation of a wet weather management program.
3. Connect trails and existing roads to obtain a complete system for OHV's
4. Reroute sections that are unsustainable such as fall line trails.
5. Where necessary, improve stream crossings that have higher or longer periods of flow.

### Wet weather management:

In 2010 we requested the assistance of the Forest District staff and Dr. Roger Poff to help us develop a scientifically based wet weather management plan for the Pozo- La Panza trail system. When sufficient data has been collected it may be possible to develop a wet weather management plan based on soil moisture conditions instead of predicted rainfall. Funding for this ongoing activity is included in the Planning Grant proposal as stated on page 1, "Relation of Proposed Project to OHV Recreation".

### We wish to add the following comments:

1. Based in this information approximately 10 per cent of the trails would be studied for relocation or rerouting to reduce maintenance requirements and potential impacts to natural resources. This will require planning and analysis by Forest specialists as described in the Planning Grant proposal. When these reroutes are identified and funding is available they may be placed on the Program of Work.
2. Trails Unlimited has submitted a proposal to flag reroutes for further study. Presumably this would be done under a contract for consultation as mentioned under "C. Statement of Activities" on page 1, although no specific contact is described in the application. It would be beneficial to have the possibility of a contract with Trails Unlimited added to the proposal.
3. We have applied for San Luis Obispo County OHV "in lieu" funds to supplement this Planning Grant for development of the Trail Plan and NEPA analysis as required.
4. The Planning Grant Statement of Activities indicates that the project should be designed to have "little to no impact". It is our understanding that The Forest Service requires minimization of impacts from trail systems, not elimination of impacts. We request this section be changed to reflect current policy.

Thank you for the opportunity to comment on the Planning Grant proposal.

Bruce Whitcher  
Central Coast Motorcycle Association