



SIERRA ACCESS COALITION

P.O. Box 944
Quincy CA 95971
sierraaccess@digitalpath.net
(530) 283-2028

April 2, 2012

TO: Plumas National Forest,

California State Parks Off-Highway Motor Vehicle Recreation Division,

All Members of Sierra Access Coalition

Subject: Comments on 2012 State OHV Grant Preliminary Applications

Sierra Access Coalition (SAC) is a group of over 1250 members who work to preserve access to public lands. We also partner with the Plumas National Forest to work on trails and promote recreation opportunities. SAC wants to see improvements in the current OHV program on the Plumas NF, but we take the State OHV Grant program very seriously and want to see the taxpayer funds applied for honestly and spent wisely. We understand the importance of State OHV funding to our local forest and we hope all of the grants submitted by the Plumas NF will be approved, but there are serious questions that must be answered first. We believe there are some changes that need to be made in the project proposals before any of the grants are funded.

The following are SAC's comments on the 2012 Preliminary Applications from the Plumas National Forest:

PNF - Ground Operations (G11-02-13-G01)

This is a very expensive grant proposal, with the project totaling \$756,988. It is unclear what will be accomplished under this grant, which makes it difficult if not impossible to comment on this expensive project.

1. The application says "This project is for trail maintenance on OHV trails only" but there are also employee salaries and requests for equipment including a pressure washer for toilets.
2. Apparently 185 miles of OSV trails will be groomed but the application doesn't state where the trails are located. The only trail work that is specified in any detail are the areas where they want to block OHV use.
3. Apparently some summer trails will be maintained? But there is no information on the location of the trails, how many miles will be worked on, or what type of work will be done. How will the trail work be prioritized? It is impossible for the public to give input to this vague and undefined proposal. It's unfortunate that the public will not have a chance to comment, even if the application is approved.
4. 120 days (360 days total) each is requested for two heavy equipment operators and one laborer. There is no mention of what work the operators will be performing. This is 6 months of full-time work for each operator so

details must be disclosed about what work will be done. There is no heavy equipment listed in the grant application. What equipment will they use and what work will be performed?

5. There is a total of 1270 days for ten GS-5 employees, which is the equivalent of 6 months full-time work for each employee. There is no description of what OHV related work these employees will be working on full-time. This is a big ticket item at \$254,000. It needs an explanation.
6. There is funding requested for three GS-4 employees for over 5 months of full-time work each, and three GS-7 employees for over 4 months full-time work each. What OHV related work will these employees be working on full-time?
7. Requesting funds for the above full-time salaries gives the impression that all the Recreation Techs on the Plumas NF will be paid with OHV funds. Will the duties of each of these employees be 100% for OHV work? What will the OHV work consist of? More information must be disclosed before the public can comment on this grant proposal.
8. A survey grade Trimble GPS unit is requested. OHV has no need for a unit with submeter accuracy, which far exceeds any Forest Service protocols. The submeter accuracy has an added cost of \$3,000. No long term need has been established for this equipment. In the past, recreation has used the district GPS units. There are approx. 12 Trimbles on the district presently. The application says the new unit will connect with more satellites which is true, but only 4 satellites are needed for Forest Service protocol so this is not a justification for new equipment. The application states the new unit would speed up data collection, but in reality it would far exceed any project data collection requirements. The application states that the old units don't work under tree canopy, which is not true. If OHV can truly justify needing better equipment, they should upgrade their existing equipment instead of asking for funds for new units that have an accuracy and capability that is far above and beyond what is needed for Forest Service work. The submeter accuracy is obtained by collecting GLONASS data but it must post process this data by a base station collecting GLONASS data. UNAVCO, CORS and Forest Service Base Station in California is not collecting this data. The FS Base Station still does not collect the L2 data. In summary, there is no viable reason to upgrade or increase the district inventory of GPS units. A need has not been established in the grant application. A few years ago, Mt. Hough District was given OHV grant funds for two GPS units and they are rarely used.
9. Requesting funds for a large storage container is over kill for a couple of snowmobiles, and it would very likely end up being used as storage for non-OHV items. If security is a problem at the Mohawk Ranger Station it should be dealt with by Forest Service management, but not at the expense of State OHV Grant Funds. However, if the State does decide to fund this item, SAC strongly suggests that the container be conspicuously marked "For State-owned OHV Equipment Only".
10. As a general comment, SAC has received several complains from the public regarding accidents involving Forest Service employees operating State-owned snowmobiles in the past couple of years. These accidents are attributed to inexperienced riders on expensive machines that are only intended for experienced riders. As an example, one accident last year cost \$4500 for repairs. These snowmobiles have State OHV Stickers on them and when the public sees them at repair shops with major damage, it has a negative impact on the OHV program. It appears the Forest Service is showing a pattern of disrespect for State-owned equipment and allowing inexperienced riders to do more than routine patrol with their machines.

1. The choice of campgrounds submitted for improvements has little to do with enhancing the OHV experience, as claimed in the application.
2. One toilet at Silver Lake is not accessible by green sticker vehicles and the second toilet at Silver Lake is not easily accessible by green sticker vehicles with several miles of back country travel required to get to it. According to the MVUM, green sticker vehicles are not allowed at the Silver Lake Campground.
3. It is difficult for green sticker vehicles to use most of the area around Brady's Camp. A Maintenance Level 3 road cuts off access to most of the trails around the campground and over to Lake Davis.
4. Funds are requested for pumping toilets at Rock Creek and Rogers Cow Camp. Both of these campgrounds are not accessible with green sticker vehicles. Pumping Snake Lake four times and Silver Lake twice makes it appear that the OHV grant program is funding the entire toilet pumping program.
5. Snake Lake is a good choice for OHVers. However, there have been several grants for this small campground recently. In 2010 a RAC grant funded a toilet, tables and fire rings. In 2011 a RAC grant funded expanding the campground for equestrians and added tables and fire rings. In 2011 a state OHV grant funded improvements at Site #7. And this year there is a request for another toilet. This campground has had a lot of work done in recent years. Is there a long term Master Plan that can help the public understand how improvements at campgrounds are planned and prioritized?
6. The application asks for 12 days funding for Road Crew. No equipment is listed and there is no description of the work they would accomplish, so it's difficult to comment.
7. The Rogers Cow Camp is proposed to be extended into an old log landing area. The grant write up makes it very difficult to figure out exactly what is being proposed. Three years ago this landing was utilized by Soper-Wheeler, so we suggest that the Forest Service use the existing surveys and applicable NEPA documents that were prepared for that ground disturbance. It would save a lot of taxpayer money for specialist time if that work is not duplicated again for this project.
8. There is a line item for two topographic surveys at \$3500 each. Why are there two individual surveys? What data will be collected with these two surveys? The application is lacking project details, making it impossible to comment.
9. The application says there is a "Timeline for Project Completion" attached, but the document is not attached and available for review.

PNF - Ground Operations Granite Basin/Mt Hough (G11-02-13-G02)

This is a good project and SAC wants to support it. But several questions must be answered:

1. This project maintains 52.9 miles of trail. The application says there is an attachment that explains which trails will be maintained and what the mitigation measures are. But the document is not attached so it is impossible for the public to know what will be done or to comment on the proposed work.
2. The two project areas are lumped into one proposal. SAC wants to know which trails are involved in each of the two project areas and the cost for each project.
3. The contract is for 579 days. Assuming 20 work days per month, the contract will fund 29 months of full-time work. With a 7 month work season, this equates to over 4 years. This is excessive for 52 miles of trail maintenance.

4. There are over 7 months of full-time salaries requested for a GS-11 employee. A GS-11 level employee is typically a manager, not an on-the-ground worker. If the GS-11 is writing the agreement, and providing contract inspection and oversight, there will be relatively little time spent on the project. This is a match, but the time should be stated accurately.
5. The “tool match” of \$65,000 needs to be explained. SAC asked the forest for an explanation before the grant application was submitted and we didn’t receive an answer, but instead the forest increased the tool match from \$56,000 to \$65,000. We still want to know what the \$65,000 tool match consists of and why it as increased. Similar projects for the Inyo NF and El Dorado NF show \$2000 and \$3000 for tools.
6. The grant asks for over \$3300 per mile for trail maintenance, even with over 51% of the work being done by unpaid volunteers. Without any explanation of work items, this seems like an excessive cost. For comparison, a grant application has been submitted by the Shasta-Trinity NF for 22 miles of trail maintenance costing approx. \$1700 per mile. We want to know why the Plumas cost is so much higher.
7. The evaluation criteria 2B says three routes will be rerouted to protect cultural sites and sensitive plants, which normally would necessitate a substantial reroute to provide effective protection. However page 2 of the application states clearly that there will be no rerouting. The project description also says there will be trail relocations. This is an inconsistency in the application, and without the list of work items it is impossible to know which is true. The public cannot make meaningful comments.

PNF - Development Granite Basin/Mt Hough New Trails (G11-02-13-D02)

SAC is supportive of this project but there are several questions that need to be answered related to the grant application:

1. Again, the application refers to an attachment that describes the trail work including vehicle type, mileage, and mitigation reassures as well as a description of each trail. But the document is not attached to the application so it is impossible for the public to comment. A SAC member requested the document and additional information from two individuals at the PNF. One employee sent a document but it could not be opened, and the other employee did not respond to the phone message requesting information.
2. The application does not say if trails will be developed for quad riders. Page 3 of the application states that “30.1 miles of new motorcycle trails” will be constructed, so the public can only assume that there are no quad trails involved. SAC has many members who ride quads in that area so they are concerned with the width and mileage of trails. SAC also has many single track riders who want to see some routes narrow for single-track users. The application doesn’t have enough information to answer these questions and make comments.
3. The cost estimate section of the grant application does not break down the two projects so it is impossible to tell how many miles will be constructed in each area and what the costs are for each project area.
4. The cost figures for this grant are not logical. The contract is for 864 days, which equates to over 43 months. Assuming a 7 month work season, this is a 6 year contract to construct 30 miles. Apparently this math is correct because the contractor is also using 864 days of travel as a match.
5. The contractor is also using 864 days of tools match, for a total of \$88,508. What is a tool match and how is the cost derived? Volunteer hand tools are worth 1/3 what the contractor’s hand tools are worth, but still provide a match of \$7,848. SAC asked for an explanation of the tool match prior to the application being submitted to the state, but the Forest did not respond to our question.

6. Q3 regarding diversified use says the project will benefit snowmobiles. This is not true, a snowmobile cannot see a single track or quad trail under several feet of snow. Or will all the trails be marked with tags for snowmobiles so they can find the routes?
7. Q4 states there is a publicly reviewed and adopted plan for the project. This is not true. Both projects are currently in the public scoping phase and have not yet entered the EA process. The Proposed Action, Purpose and Need, etc. have not been developed. No decision has been signed by the Forest Service. Although SAC is supportive of this project, it has not gone through the NEPA process yet.
8. Q6 states that over 50% of the project will include technologies such as alternative fuel vehicles and equipment, permeable asphalt, solar and wind energy sources, low volatile paint/sealants/carpet, practices that meet LEED Silver standard, water efficient landscaping, and low-flow plumbing. It is unclear how any of these items apply to this particular project.
9. Q8 states the trails will benefit equestrians, which SAC supports. Will the trails be constructed according to the Equestrian Design Guideline book published by the USFS and US Dept of Transportation, and US Forest Service design protocol for horse and pack stock? No details of the trail designs are included in the grant application so it is impossible for the public to comment. But it is important for equestrians trails to be built to these standards.
10. Q9 states the public had input into these projects during the Travel Management Planning process. That is not an accurate statement since comments for future work were not accepted or discussed with the public during the TMP. However, there was one public meeting a couple weeks ago where a portion of the meeting discussed the motorized Mt Hough Trails.

PNF - Planning Beckwourth Summer/Winter (G11-02-13-P03)

1. There have been several public meetings for planning on this project, which is funded by a 2011 OHV grant under the name of "Lake Davis Summer/Winter Recreation Area". The Forest Service has now changed the project name and is applying for another grant for staging areas.
2. SAC supports the project in theory. There is little controversy with the summer portion of the project, but the winter portion is highly controversial.
3. The 2011 OHV grant stated project objectives include reducing OSV pressure at Lakes Basin and to revitalize the local economy at Lake Davis and Portola. Having staging areas at Jackson Creek or Willow Creek will not satisfy either of those objectives.
4. The public and local businesses want to have a groomed OSV trail at Lake Davis, which was the intent of the 2011 grant. But the Forest Service now wants to move the groomed trail away from Lake Davis and locate it off Hwy 70 at Jackson Creek or Willow Creek. Of the three proposed locations for a grooming shed, Lake Davis is the only acceptable location. The other proposed locations do not have adequate snow coverage and an extremely short season for deep snow. This situation will "ground" the groomer for most of the season, which would be an embarrassment to the State and the Forests Service.
5. Jackson and Willow Creeks are both southern exposure and don't receive deep snow at the lower elevations, so these options are not acceptable to the snowmobiling public. It is also a conflict with wheeled vehicles that historically use the Jackson Creek Road for winter hunting.
6. SAC questions the grant request of 80 days (4 months full-time) for a wildlife specialist to look at 3 staging areas. This seems to be an excessive amount of time.

7. Lake Davis is listed as an OSV area in the "Guide to California Off-Road Adventures" brochure and map that is published by the OHMVRD. Lake Davis OSV trails are also shown on the Plumas NF Guide to Lakes Basin / Lake Davis Snowmobile Trails map and brochure. Neither of these maps show trails at Jackson or Willow Creeks, because they are short season use trails.
8. If this grant is funded, it must only be for a groomer shed at Lake Davis.

PNF - Planning Dispersed Camping (G11-02-13-P01)

1. SAC is very supportive of this grant and we will commit volunteer time. However it is not clear in the grant application what the final product of this planning process will be.
2. Will the final product of this project be a signed decision (CE or EA)? Or is this grant just for planning?
3. Will the new approved routes be added to the MVUM as a product of this grant? What is the timeframe for this to happen?

PNF - Planning Janesville/Chilcoot (G11-02-13-P02)

1. SAC is supportive of staging areas for OHVs. But it is unclear what the final product of this planning process will be.
2. Will the final product of this project be a signed decision (CE or EA)? Or is this grant just for planning?
3. Will the new approved staging be added to the MVUM as a product of this grant? What is the timeframe for this to happen?

Plumas County Sheriff's - Law Enforcement (G11-03-13-L01)

SAC supports the Sheriff's grant request. It is refreshing to see the Sheriff's Dept. purchasing two new snowmobiles and one new snowmobile trailer as a match, rather than requesting state funds for equipment purchase.

In summary, with the magnitude and multitude of unanswered questions many of the details for these grant requests are missing, unclear, and inaccurate. SAC cannot support these grants as written. After the missing documents are added and questions are answered, we would like to have a 2nd review and comment at that time.

Thank you for the opportunity to comment on the grant requests. With dwindling State OHV dollars, we feel it's very important to monitor the potential projects and how they are actually spent. The public deserves to see the funds spend wisely and honestly to promote and enhance OHV use.

Corky Lazzarino
Executive Director