

District 36 Meeting Minutes
Location: Zoom (remote) April 20th, 2022
Referee's Meeting 7:30PM – 8:30PM

**NOTES: If topic is not on the agenda, it will be added to the non-agenda items,
if approved by the president for the next meeting**

- Meeting Called to Order @ 7:33pm by Katie Pond (President)
- Roll Call (Monique Whitworth)
 - o 15 of 25 Clubs/Promoters present
 - o 34 of 67 Committeemen present
- Approve Minutes (March, 2022), motioned by Jeremy Carlin; minutes approved.
- Guests: No guests in attendance for April, 2022.
- Correspondence: No correspondences for April, 2022.

Committee Reports:

Maximum time spent on each agenda item is 3 minutes. If unresolved, it goes to the Parking Lot to be added to the agenda for the next month.

- Sanctioning (Katie Pond)
 - o The SCRUI GP has been rescheduled to 10/30/22.
 - o Any events that need to be cancelled or rescheduled, please reach out to Katie Pond immediately.
- Membership (Cat Swenston)
 - o 223 April renewal forms were mailed out
 - o 313 membership cards have been mailed out since March 12th, 2022.
 - o Membership has not received the membership applications from the March 26th Dirt Track event at MMX or Shasta GP.
 - o 3 new Life Members:
 - Dennis King, 81C
 - Elizabeth Bahr, 192Y
 - Don Campbell, 135A
- Youth Cross Country (Jimmy Whitworth)
 - o There have been 2 races since our last meeting:
 - Phantom HS with a total of 168 youth riders
 - Shasta Dam GP with a total of 146 youth riders
 - o The Klim medical vests have been received for on course medical and have been working out great.
- Cross Country/Scoring (Jeremy Carlin)
 - o Phantom HS
 - 575 riders, \$1,090.00 deposited from sales at registration
 - Jeremy would like to give a shoutout to the Ghostriders. On Saturday there was discussion that Sunday would need to be cancelled due to the

weather. After a lengthy meeting Saturday night, the Ghostriders came up with a solution and the race on Sunday was able to happen.

- o Shasta Dam GP
 - 408 riders, \$570.00 deposited from sales at registration.
- o Just a reminder to all Clubs & Promoters: Please make sure you are using the NEW membership books. If you have not been given membership books in 2022, then you are most likely using the old version.
- Enduro/Family Enduro (Bruce Hendrickson)
 - o Wild Horse Enduro had a total of 128 riders.
 - o Pre-Entry is open for both the Fools Gold Enduro and 49'er Family/Sprint Enduro
- Dirt Track (Carter Fisher)
 - o MMX ST on 3/26/22
 - 52 riders, 68 entries
 - o Lodi MC ST on 4/2/22
 - 102 riders, 149 entries
 - o Next race is on 4/23/22 in Lodi.
 - o Edward Peevy is interested in becoming a promoters and hosting a Dirt Track event at the Gold Country Fairgrounds. Katie Pond has been in communication with him and will follow up.
- Dual Sport (Jerry Fouts)
 - o No report at this time.
- GP Series (Kevin Wiley)
 - o MMX GP has been added to the schedule on 5/22/22.
 - o Brian Garrahan suggested 2 venues up in Redding for Kevin to check out for future GP events.
- Sponsor Committee (Charlie Coiner/Brad Rosbach)
 - o We have a new sponsor to District 36: Merced PowerSports.
- Social Media (Brad Rosbach)
 - o All is well behind the scenes of social media.
- Contingency Committee (Rachel Douglas)
 - o All contingency submittals are current.
 - o KTM and Husky have the most signed up for contingency. Team Green (Kawasaki) and Yamaha have many riders eligible, however many are not signed up. If you need help signing up, please reach out to Rachel.
 - o At CC events, riders need to ensure the bike in our system, matches the bike they are riding. Once results are calculated, bike manufacture cannot be changed.
- Newsletter/Website/Operations Manual (Bill McGibbon)
 - o The Operations Manual have been printed and distributed.
 - o The website is up and running, however, if you come across information that is outdated, please let Bill know immediately.
 - o The next newsletter will be out July 1st.

- AMA/Congress (Jerry Fouts)
 - There will be a spot open for an AMA Commission member in September.
- Director of Competition (Sean Rhodes)
 - There were two issues since our last meeting, however the Stewards have handled them.
- LAO (Don Amador)
 - See attached report.
- Clubs/Promoters/Members – Question/Answer *This is not for club announcements*
- Old Business
- New Business
- Good of the Body
 - Katie Pond reads a letter from Ryan Powell regarding the passing of his father, Rex Powell.
- Ed Santin motioned to adjourn; Meeting Adjourned @ 8:41pm

BREAK

Competition Committee Meeting

- Meeting Called to Order @ _____
- Roll Call (Monique Whitworth)
 - _____ Active members of _____ Clubs/Promoters present.
- Protests
- New Clubs
- Old Business
- New Business
- Motion to adjourn by _____; meeting Adjourned @ _____

Board Meeting [8:30-9:30]

Maximum time spent on each agenda item is 5 minutes. If unresolved, it goes to the Parking Lot to be added to the agenda for the next month. Comments and business by the BOD only unless approved by the President. Please keep your report to 5 minutes in length. Questions will be limited to 3 minutes.

- Meeting called to order @ 8:47pm by Katie Pond (President)
- Roll Call (Monique Whitworth)
 - o 9 of 9 members present
- Old Business
 - o Underage drinking at events (tabled from March, 2022)
 - After much discussion from previous months, it is concluded that it is not up to District 36 to police underage drinking. There is no objection or discussion and this matter is now considered closed.
 - o New trailer for Cross Country (tabled from March, 2022)
 - Jeremy has found a solid quote in Nevada, which is about \$2,000.00 less than quotes in California. However, Jeremy is still doing the math and measurements and would like to table this to May, 2022.
 - Jerry Fouts suggests that District 36 lease Jeremy Carlin's golf cart to use for Official Use at CC events. Jeremy Carlin states the problem with that is that there is no roof on his personal golf cart. A roof/windshield would be needed to use in inclement weather at events. If he were to add a roof/windshield, then Jeremy's personal golf cart would not fit in the current trailer being used. Brad Rosbach states the problem with leasing Jeremy Carlin's personal golf cart is that District 36 would need to insure the golf cart and list everyone who would be driving said vehicle.
- New Business
 - o Strategic Plan for future (Jerry Fouts)
 - Jerry Fouts would like to reach out to Scott Harden, a consultant, who can help District 36 move forward in a more current world, possibly an electronic future. Mr. Harden's hourly rate is \$400.00. Prior to meeting with him, D36 would need to make a list of goals. Jerry suggests getting a committee consisting of, Charlie Coiner, Brad Rosbach and Dave Wright on a call with Mr. Harden.
 - Brad Rosbach suggests that our Membership Director, Cat Swenston, also be involved in any committee in regards to discussion of an electronic future.
 - Jeremy Carlin likes the idea of a committee, but believes there needs to be a list prior of what we want it to do, then use the consultant to help get us in that direction.
 - The committee should have an understanding of scoring from each discipline.
 - A committee is formed consisting of Jerry Fouts, Brad Rosbach, Dave Wright, Jeremy Carlin and Cat Swenston.
 - Talks will begin immediately and more information will be followed up at a later date.
- Adhoc Committee Updates

- Non Agenda Items (There will be 5 minutes TOTAL allowed)
 - Jeremy Carlin brings up the mileage pay regarding reimbursement for Stewards and Kathy Carlin with CC Scoring.
 - Brad Rosbach makes a motion that fuel needs to be paid, pending receipts be turned in on an expense report.
 - Jeremy Carlin states that the \$0.58 p/mile that is currently paid is to be used for fuel, wear and tear and maintenance.
 - Brad Rosbach moves to strike his previous motion for Katie Pond to do some research regarding this issue.
- Good of the Body
- Executive Session
 - No executive session.
- Motion to adjourn by Ralph Lee; meeting adjourned @ 9:35pm



Amador District 36 LAO Overview and Activities Report March 16 to April 20, 2022

D36 Mission Statement

District 36 is a volunteer-based non-profit organization of motorcyclists and like-minded enthusiasts who organize and enhance responsible family recreation and exercise environmental conservation for the purpose of promoting today's activities and protecting our sport for the future.

Dear Board of Directors,



May 2021 D36 Interagency Field Trip at Clear Creek

CONGRESS SENDS CA BLM LETTER/REQUEST TO REOPEN CLEAR CREEK - As you know, the LAO continues to run point on a multifaceted effort to reopen Clear Creek to OHV use. The latest bit of good news is that Congressmen Panetta and Valadao sent in a joint letter (attached) to the BLM requesting they start the administrative process to reopen Clear Creek. This current effort was bolstered by the May 2021 field trip facilitated by the LAO working with the BLM and San Benito County.

ROGUE/ILLEGAL SxS USE AT DAVIS FLATS CAMPGROUND – The LAO met with the District Ranger for the Grindstone Ranger District (they manage the Stonyford OHV Area) regarding illegal discharging of auto weapons at Davis Flats Campground, reckless driving, poaching single track and ATV trails, etc.

The agency said they have increased patrols which did confront rogue SxS groups and confiscated illegal weapons, made arrests, etc. They are committed to getting this serious issue addressed for obvious public safety reasons and because they understand it makes it difficult to host competition events such

as enduros on Forest lands. **Please immediately call – 925.783.1834 - or TEXT the LAO/AMADOR if you see any of this illegal activity.**

The LAO has also contacted the CA OHV LE staff and they are ramping up capacity to address it should it come to SVRAs. There are concerns these are Cartel-based groups and riders.

CLOSED/OPEN COURSE EVENTS AT SVRAs – The OHV Division and its Park Ranger corps have committed to use an “educational approach” to the 2022+ model year registration mess created when our competition bill did not pass last year. The LAO understands that all state park rangers at SVRAs are committed to this approach.

However, if there are any issues please contact the LAO immediately.

Also, the OHV Division continues to work with federal law enforcement on this issue while our legislation is in process. The LAO continues to communicate to law enforcement about the need for them to work with riders at events – such as they did at the Shasta Dam GP - using education outreach as the enforcement tool vs. issuing citations and fines.



LAO Testifying In-Person at March 22 Hearing

COMPETITION BILL (SB 894) – The LAO continues its work with Senator Jones and other legislators, the administration, and co-sponsors at the MC Dealers Assn. continue to work hard on smoothing the path that our competition bill (SB 894) must navigate. GOOD NEWS is that our bill passed the Senate Transportation Committee hearing on March 22 where the LAO and our lobbyist gave official testimony. It also passed by consent this week before the Senate Water and Parks Committee. It has now been sent to the Senate Appropriations Committee.

The bill supporters remain committed to getting new 2022+ model year competition bikes registered and titled with the DMV and to resolve any confusion with state and federal law enforcement about the definition of closed course and allowing competition bikes to compete at sanctioned competition events (i.e. GPs, Hare Scrambles, enduros, etc) held on public lands.

How to submit comments in writing:

By email:
planning@parks.ca.gov

By mail:
C/O Katie Metraux
OHMVR Division, California State Parks,
P.O. Box 942896, Sacramento, CA 94296-0001

Comments are due April 30, 2022

COMMENTS DUE APRIL 30, 2022 ON CARNEGIE GENERAL PLAN

CARNEGIE GENERAL PLAN UPDATE- On April 19, the LAO, Jerry Fouts, and Ed Santin attended a public forum where Parks gave a presentation on The California Department of Parks and Recreation (the Department) Off-Highway Motor Vehicle Recreation (OHMVR) Division being the lead agency for the preparation of a General Plan Update and associated environmental impact report (EIR) for the original Carnegie State Vehicular Recreation Area (SVRA). (A General Plan was prepared for both the original Carnegie SVRA with an expansion area, but the Expansion Area has been removed from the Project). The decision-making body for the General Plan Update and EIR is the OHMVR Commission, a body of appointees that advises the OHMVR Division and has final authority of approval of General Plans and certification of associated EIRs for SVRAs.

The OHMVR Division has prepared this Notice of Preparation (NOP) pursuant to Section 15082 of the California Environmental Quality Act (CEQA) Guidelines. This NOP informs agencies and the public that an EIR is being prepared to address potential impacts resulting from approval and implementation of the Carnegie State Vehicular Recreation Area General Plan Update. Agencies should comment on the elements of potential environmental effects relevant to their statutory responsibilities in connection with the proposed Project.

The OHMVR Division previously prepared a General Plan Revision and associated Program EIR for the original Carnegie SVRA and the adjacent 3,100-acre Alameda and Tesla Expansion Area in 2016. Lawsuits and subsequent legislation required that the Alameda and Tesla Expansion Area not be designated as an SVRA. The Department elected to prepare a standalone General Plan Update for the original 1,575-acre Carnegie SVRA.

Scoping Period

Comments on the scope of the General Plan Update and EIR will be accepted until 5:00 PM, April 30, 2022.

Please send comments via email to planning@parks.ca.gov

with the subject line “Carnegie SVRA General Plan Update”.

To send comments by mail, please address to:

California State Parks
OHMVR Division
c/o Katie Metraux
P.O. Box 942896
Sacramento, CA 94296-0001

The LAO and other D36 leads went on the record to state the import of maximizing lands in the original SVRA to be used for casual use and permitted events. Many areas in the original park have been closed and must be reopened and used to mitigate the loss of future OHV use on the Tesla property. Staging for competition events must be restored on the east end and enhanced as well including substantive improvement on event routes for ingress and egress.

SPEEDWAY AT HUMBOLDT COUNTY FAIRGROUNDS – The LAO, Jerry Fouts, and Chris Real continue to work with Steve/BigTime on finding sound mitigation measures that will meet the objective of the Humboldt County Board of Supervisors and the Fairgrounds so the 2022 Speedway Event can take place.

STABILITY OF OHV TRUST FUND - The LAO Program continues to have concerns about the ongoing expenditure of monies and staff time for mitigation of the “Dust Issue” at Oceano Dunes SVRA and the impact it is and could have on management and funding of the other SVRAs. We also have strong concerns about Trust Fund monies being misused for non-OHV related issues. The LAO continues to believe an audit might be needed to highlight flaws in said spending and is actively exploring that option. The D36 LAO was a key lead in getting the 2005 CA State Audit that led to the overhaul of the OHV program in 2007.



IMPORTANT OHV ROUTE PROTECTED FROM PCT CLOSURE PLAN

FOREST PLAN REVISION PROCESS AND THE PCT - As many of you know, the Pacific Crest Trail (PCT) runs mostly north-south along the top of the Sierra Nevada Mountain Range. It is a human/horse powered route only. However, there are many black diamond motorcycle single trails and 4WD routes that cross or run adjacent to the PCT. About 6 years ago, the Pacific Crest Trail Association proposed that ALL OHV and OSV routes be closed to motorized use if hikers on the PCT could see or hear the OHV.

As you might expect, the LAO Program and many of our land use partners raised hell about that and attended numerous public meetings and submitted comments and filed objections against the plan.

Believe it or not, it appears the Forest Service heard our voices and has backed off of any closures of legal OHV routes that cross or are near to the PCT. That is highlighted in documents recently posted by the Sierra and Sequoia National Forests as part of the final Forest Plan Revision Process.

LINK TO PCT PLAN (Which should be followed in other National Forests in Nor Cal)
https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd1010067.pdf

The LAO filed official comments in 2019 on behalf of our members regarding the Sierra and Sequoia NF's Forest Plan Revision Process (see attached). It highlights some of our concerns and suggestions.

The LAO will continue to be engaged on the Forest Plan Revision Process for other Forests in Northern CA as they crank up things after the COVID-19 shutdowns.

UPDATING COUNTY GENERAL PLAN FOR OHV – The LAO will continue to work with Brian Garrahan and San Benito County Supervisor, Bob Tiffany, on an effort in 2022 to update the General Plan to reflect their commitment to support OHV events on private lands. An update that is friendlier to D36 sanctioned events should also reduce extensive environmental review for competition events.

HOLLISTER HILLS UPPER RANCH FOR D36 EVENTS - The LAO met with Hollister Hills SVRA Planners in March to review potential for allowing D36 events to use the Upper Ranch 4x4 Area. Planners said the UR area outlined in the map above could support a new D36 event. If the District/Clubs would like to review event options with Hollister leads, they should contact Chris Silverberg at - Christina.Silverberg@parks.ca.gov



Old Cement Plant Property near San Andreas for Potential D36 Events

CALAVERAS COUNTY - The LAO is waiting for an update soon from the county planning lead for this project – Tim Pitt- and he continues to work with his planning supervisor on the import of having our events on private lands in Calaveras County. The LAO will continue to work with D36 officials and clubs on securing new event venues.

MAJOR WIN IN LONG BATTLE FOR WALKER RIDGE – For over 20 years, the LAO has fought hard with other partners to kill various wind energy proposals that would site a 2-4K acre wind farm on top of Walker Ridge right where there are popular high skill OHV trails. We did win another victory in this fight when on Feb. 28, 2022 the BLM stated they would deny the permit to build a wind energy farm. This project would have severely limited the agency’s ability to designate a legal OHV route system that used any part of the ridge.

STREAMLINING THE SVRA EVENT PERMITTING PROCESS - The LAO continues its work with Parks to stress the important of streamlining the competition event process and to make the process consistent throughout the SVRA system. The LAO is optimistic that Parks will accomplish this important task.

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Congress of the United States
Washington, DC 20515

April 7, 2022

Ms. Karen Mouritsen
State Director
California Bureau of Land Management
2800 Cottage Way, Suite W-1623
Sacramento, CA 95825

Dear Director Mouritsen:

I write to urge the California Bureau of Land Management (BLM) to move forward with reopening the Clear Creek Management Area (CCMA). Recognizing the work we have done together under your leadership in recent years to explore reopening, it is past time to pursue an administrative process that will lead to the reopening of CCMA to environmentally-sound Off-Highway Vehicles (OHVs) and provide motorized access to non-motorized activities within the management area. This action will lead to increased recreational access, improved safety, and decreased illegal activity.

As you know, the Clear Creek Recreation Area was a nationally recognized, 70,000-acre OHV recreation area that provided motorized access to non-motorized recreation and other outdoor activities such as hunting and geological exploration. Before its closure, Clear Creek registered over 35,000 visits a year and was named one of the top 10 off-road areas in the nation. CCMA was an important economic link among California's many statewide OHV recreation districts. Its abrupt closure by BLM has resulted in serious economic consequences for surrounding towns that rely on recreational visitors in the region. Additionally, the closure created severe overcrowding and capacity issues at the Hollister Hills State Recreation Area, as well as other county, state, and federal OHV sites throughout California.

It is our understanding that BLM is undertaking an internal review process to consider the latest scientific information and risk assessments from EPA. We urge you to expedite this process and provide an update on this review to our offices at your earliest convenience. Each day the CCMA remains closed, more resource damage occurs due to illegal trespassing onto closed areas with sensitive habitats and important cultural resources.

The tour of the CCMA led by California BLM's Central Coast Field Office was an important opportunity for local stakeholders and government representatives to learn about the risks associated with reopening the area, as well as for BLM to hear the concerns of the community that strongly supports reopening of the recreation area. Unfortunately, since that tour, little progress has been made toward reopening. We must renew our efforts to safely reopen Clear Creek.

Congress of the United States
Washington, DC 20515

Local residents and community stakeholders have made it clear they support reopening the CCMA for recreational purposes. We look forward to working with you and other related agencies to allow partial or full reopening of Clear Creek and reestablish this important recreation-based economic benefit to San Benito County, while reducing illegal trespassing and bringing relief to other overcrowded recreation sites across the State.

Thank you for your time and consideration of this important matter. Please reach out to our offices with any additional questions and let us know if we can provide further support in navigating the regulatory permitting processes that may impede reopening efforts. We stand ready to support your office.

Sincerely,



Jimmy Panetta
Member of Congress



David G. Valadao
Member of Congress



September 26, 2019

Sent via electronic transmission

Plan Revision Team Lead
1323 Club Drive
Vallejo CA 94592

Dear Planning Team:

Please accept these comments on the Revised Draft Environmental Impact Statement (RDEIS) and Revised Draft Land Management Plans (RDLMP) for the Sequoia and Sierra National Forests. These comments are filed on behalf of the American Motorcyclist Association District 36 (D36). This document shall not supplant the rights of other D36 agents, organizational or individual members, and partners to submit their own comments. The agency should consider and appropriately respond to all comments received.

D36 commends the agency for its transparency and robust outreach effort to engage the public on this important planning process.

D36 has reviewed the RDEIS and RDLMPs and believes that Alternative B (the preferred alternative) provides the foundation upon which to create an Alternative (Modified Alt. B) that would increase fire and forest health related vegetative treatments, provide sustainable wood products for local timber or biomass businesses, protect cultural resources, and enhance recreational opportunity.

D36 appreciates that Alternative B recognizes the importance of current and future collaborative planning and partnerships to address recreation and forest health management activities.

COMMENTS AND CONCERNS

Issue One - Sustainable Recreation and Designated Areas

RDEIS Vol. 1- pages 26-27 - D36 appreciates the agency response to public comments from the OHV community in the draft EIS that the 40-year old Recreation Opportunity Spectrum (ROS) was unclear and did not adequately address contemporary recreation uses and management needs. The ROS could often create confusion between plan level management and travel management, which is a project level decision.

D36 supports the agency's creation, in Alternative B, that includes three distinct and new recreation management areas (RMAs) as described below.

Destination recreation areas (DRAs)—These areas would have high levels of recreation, supported by more facilities, amenities, and services than other areas. Iconic destinations or well-known features attract visitors to specific locations. ROS classes in DRAs would be primarily rural, roaded modified, and roaded natural, with some semiprimitive motorized and semiprimitive nonmotorized.

General recreation areas (GRAs)—These areas would be less developed, with fewer facilities, amenities, and services than DRAs. There would be opportunities for a range of activities for visitor participation, with moderate levels of use. ROS classes in GRAs would be primarily rural, roaded natural, and roaded modified, with some semiprimitive motorized and semiprimitive nonmotorized.

Challenging backroad areas (CBAs)—These areas would be undeveloped, natural, and suited for dispersed recreation and more challenging activities. CBAs would be maintained for low visitor use and density and limited Forest Service presence. They would be generally in remote areas with few amenities and limited recreation management.

Motorized and nonmotorized uses would both be expected in CBAs, but they would be challenging, due to the terrain and the low density of roads and trails. Use levels would be low and users would be spread out, minimizing opportunities for conflict. ROS classes in CBAs would be primarily semiprimitive motorized and semiprimitive nonmotorized, with some roaded natural and roaded modified.

D36 is concerned that permitted motorized events such as enduros, dual-sport rides, and adventure touring are not specifically identified as examples of permitted recreation special events. This omission could cause confusion in subsequent administrative permit decisions for both motorized and non-motorized recreation special events.

Solution: In the RDEIS - Plans – Vol 2 – Page A-103 - Desired Condition (REC-FW-DC) – (10) Include examples of both motorized and non-motorized permitted special uses, such as recreation special events or guided activities, which are consistent with recreation settings and/or clarify that particular uses, including special uses, will undergo site-specific analysis which may allow project-level specifications or approvals outside of broader settings prescribed by or discussed in the Forest Plan.

Issue Two – Pacific Crest National Scenic Trail

RDEIS - Vol. 1 – page 27 – Alternative B creates a visual management zone or corridor for the Pacific Crest National Scenic Trail (PCT) that would be up to one-half mile from the centerline of the trail, where visibility is not obscured by terrain.

D36 believes that any management prescription must be based in reality that recognizes the PCT traverses many “non-Wilderness” areas that include OSV, OHV, hunting, fishing, and mountain-biking. In addition, the PCT directly crosses, or crosses in close proximity to, many highways, ski areas, private inholdings, and other “non-Wilderness” activities. In other words, an inflexible one mile-wide swath of “wilderness” along the PCT centerline does not comport with the intent of applicable law/regulation or the practical nature of the broad and varied terrain the PCT traverses.

REDEIS – Vol 2-A-126 – states the following below:

Guideline (MA-PCT-GDL) (03) Designated roads and all trails within the corridor should minimize impacts to the scenic, natural, and experiential values of the trail. Exemptions may be allowed if required by law to provide access to private lands or determined to be the only prudent and feasible option.

Suitability (MA-PCT-SUIT) (04) Designated roads and trails within the corridor, including crossings of the Pacific Crest National Scenic Trail are suitable.

D36 is concerned that Alternative B is unclear on the immediate or future impacts (e.g. closure, restrictions, or other prohibitions in current or subsequent travel plans) that the PCT corridor or zone will or could have on designated motorized roads or trails. As the agency knows, there are a significant number of motorized routes or OHV staging areas that cross, parallel, or otherwise exist within the proposed PCT corridor, not only in this portion of California, but throughout the Sierra Nevada and Northern Coastal Mountains. We are particularly concerned that a revisionist nose under the tent will somehow seek a wide and impractical “buffer” through the heart of the Cascade-Sierra Crest of Wilderness-like management prescriptions, plainly contrary to the language of the PCT Act or any plausible understanding of Congressional intent.

D36 strongly objects to creation of the new PCT zone unless the agency clarifies immediate or future impacts to motorized recreation including route designation and permitted motorized special recreation events. We believe that PCT management may be susceptible to a collaborative management solution, including certain special interests on varying sides of the midpoint on this issues, to at least partly include D36 and the PCTA. The PCT Act, like many “environmental” statutes, was enacted in an era when issues and engaged interests were simpler, less diverse, and less complicated by their relation to broader contexts. The basic concept is intuitive that a non-motorized PCT can traverse a north-south path through North America, but the expansion of that concept is highly problematic that might create swaths of quasi-wilderness lands through the varying affected jurisdictions and landscapes. D36 believes these concepts can be reconciled in a practical manner on specific sites and/or with carefully crafted language, and would like to participate in that effort.

Solution: Remove the new PCT zone from the document unless the agency clarifies its impacts upon current and future motorized use on designated routes within the PCT corridor.

Issue Three – Fire/Forest Management

RDEIS - Vol. 1 – page 20 - D36 supports the management direction framework in Alternative B to improve ecological fire resilience and restore fire as an ecosystem process at a landscape scale. Alternative B establishes strategic fire management zones and emphasizes active management in the form of vegetation treatments, mechanical thinning, and prescribed burning. These actions would support the natural starts of wildfires, which would benefit the resources in areas where it can be safely managed.

Proposed plan direction for both national forests emphasizes treating vegetation along key roads and ridges and connecting natural openings, such as rock outcrops. This could make it easier to implement larger prescribed burns and manage or suppress fires. Treatments would focus on drier sites near the roads and ridges, where restoration would move vegetation toward desired conditions. In addition, plan direction emphasizes reducing the threat of wildfire near communities and community assets.

D36 believes agency should protect and mitigate impacts to engineered system trail infrastructure during any pre or post-fire treatments or in forest health vegetative projects. Those projects should be reviewed as to how they might potentially impact motorized use on designated roads, trails, and areas.

The impacts from non-recreation projects often include obliteration/"storing" of the trail or removal of water control structures such as rolling dips and catch basins. Those soil erosion measures can often cost \$15,000 to \$20,000/mile to install (or replace). Other sections within the DEIS reflect similar potential impacts to recreation management, such as the discussions of at-risk species, water quality, and ecosystems.

D36 also believes that opportunities to enhance OHV trail-based recreation should be included in forest health projects as appropriate.

Solution: D36 recommends that "trail mitigation" guidelines be added to relevant non-recreation projects. Agency recreation or trail specialists should be part of any fuel/forest health project interdisciplinary team to help mitigate potential impacts to recreation facilities and/or enhance trail opportunities.

Issue Four – Eligible and Suitable Wild and Scenic Rivers

RDEIS – Vol. 1 – page 613 – D36 is concerned about potential impacts to existing and future OHV/OSV opportunities that could or would be impacted by wild and scenic river designations and their associated non-motorized buffers. There is a chance that WSRA corridors are improvidently identified and/or modified, in a manner that might affect but insufficiently disclose impacts to existing or otherwise allowable uses, including motorized/mechanized means of transport. See, ECF 64, Order dated Oct. 18, 2017, in *Ten Lakes Snowmobile Club v. U.S. Forest Service*, Case No. 9:15-cv-0148-DLC (D. Mont.). D36 requests the opportunity to review and confer upon these corridors and possible effects, and participate in a process that will avoid and/or mitigate any such impacts.

Solution: Ground-truth said proposals for potential impacts to OSV/OHV recreation and either mitigate impacts or withdraw said river segment from the alternative.

Conclusion

D36 believes that a Modified Alternative B that addresses our aforementioned concerns/solutions will best serve the public to enhance recreational opportunities and protect/preserve our natural resources for future generations.

D36 appreciates this opportunity to be involved in the public planning process on behalf of its members who enjoy recreation in the project areas. Please contact me if you have questions or wish to discuss any aspect of these comments.

Respectfully submitted,

Don

Don Amador
Government Affairs
AMA District 36
555 Honey Lane
Oakley, CA 94561
Office: 925.783.1834
Email: damador@cwo.com
Web: <http://ama-d36.org/>