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Stanislaus OSV ID Team Lead  
ATTN: Phyllis Ashmead  
19777 Greenly Road  
Sonora, Ca. 95370

August 5, 2015

Re: Over-Snow Vehicle use

Dear Ms. Ashmead,

On behalf of the 755 local members of the Sierra Club, I would like to express concerns that would allow snowmobiling in existing wild areas as proposed in the Stanislaus Forest "Over-Snow-Vehicle use" plan.

Our members are very concerned that the Near Natural areas are included in the 13,000 acres of additional space for snowmobiling being proposed. We are not opposed to adding some additional acres for snowmobiling but are strongly opposed to include the Pacific Valley and Eagle/Night Near Natural areas, for several reasons.

The proposed plan allows for riding snowmobiles in remote habitat areas and higher elevations that have previously been deemed, by the USFS, highly valued for non-motorized recreation. Higher elevation habitats are crucial for rare wildlife like the Sierra Nevada red fox and American marten and other wildlife including the Yosemite Toads in the Highland Lakes area. The ecosystem is already stressed with climate change and resulting environmental changes. Who knows if or when the current conditions will change. The added stress of loud noise and the physical disturbance of snowmobiles running through the forest should be reason enough not to include the "highly valued for non motorized areas" in the proposed plan. The U. S. Fish and Wildlife Service has an article titled "Snowmobiles and National Wildlife Refuge System Lands". This article has arguments regarding prohibiting snowmobiles in the areas of recommended wilderness and in "near natural areas" which are contiguous to existing wilderness areas. If these acres are opened up it will be very difficult in the future to return them to protected Wilderness status.

It is our understanding that due to budget constraints and lack of human resources, the forest service has not been able to effectively enforce the current boundaries where snowmobilers ride. It's highly unlikely that the Forest Service will be unable to enforce an additional 13,000 acres. Many of the proposed new boundaries in the proposal do not follow natural terrain including ridges or streams which will result in snowmobilers trespassing into Wilderness areas. Enforcement of the new boundaries when current boundaries are not enforced is unlikely.

We appreciate the opportunity to provide these comments on this important proposal and look forward to a mutually agreeable solution for all of the public's concerns.

Best regards,

A handwritten signature in black ink, appearing to read "C. Rick Delvin".

C. Rick Delvin  
Chairman

...to explore, enjoy, and protect the nation's scenic resources...

