

From: Vicky Hoover
To: [FS-comments-pacificsouthwest-stanislaus](#)
Subject: OSV comments
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I support Alternative 3 in the Stanislaus National Forest's draft plan for for future Over-snow Vehicle (OSV) management on the Forest--even though Alternative 5 is marked as the forest's preferred alternative. For much of the forest, I think that alternative 5 adequately balances OSV use with protections for non-motorized recreation, natural resources and wildlife.

However, there are two roadless areas which the Alt. 5 proposes to open to motorized uses that should stay closed to motorized over-snow use. Alternative 5 proposes to designate as open to motorized over-snow-vehicle (OSV) winter use the highly sensitive 10,500-acre Pacific Valley Roadless Area--surrounded by the present Carson-Iceberg Wilderness and, itself a potential addition to it, and also the Eagle Roadles Area, north of the Emigrant Wilderness as open to motorized use in winter.

Based on the 1991 Stanislaus National Forest Management Plan, confirmed by Forest Plan Direction in March, 2017, these areas must be managed as semi-primitive non-motorized areas. The 1991 plan names them both as "Near Natural Areas". There is no good reason given for changing this directive. In fact, the nearby Wilderness Areas--especially the Emigrant--are so popular and often crowded, that additional areas such as the Pacific Valley and Eagle Roadless Areas, ought to be kept as eligible for future wilderness designation. Quiet recreation within wilderness is highly sought after. Winter motorized use absolutely degrades the quiet recreation experience of cross-country skiers and snowshoers.

Opening the Pacific Valley roadless area to OSV travel could harm the Pacific Creek population of threatened Lahontan cutthroat trout. Pacific Creek has been found eligible for Wild and Scenic River Status. Also the Pacific fisher and pine marten depend on Pacific Valley's critical old-growth forest habitat--rare remnants within the Stanislaus Forest. In addition, Pacific Valley roadless area has a tiny — recently rediscovered band of endangered Sierra Nevada red fox.

These wildlife impacts are even more significant than the effect on quiet human recreation.

The Eagle Roadless Area is an important potential addition to the popular and often crowded Emigrant Wilderness to the south. The area supports old growth forests and is also famed for its Native American cultural values.

But if these areas were opened to OSV use, they would all-too quickly become ineligible for future consideration as wilderness.

Just because OSV travel leaves no lasting tracks after the snow melts does not imply there are no impacts on the surrounding environment. OSV travel can directly damage small trees trying to survive with a heavy snow covering, and the compaction of the snow harms small creatures that scurry around through undersnow tunnels as they seek scarce food sources. Compacted snow by snowmobiles can gives coyotes, preying on the tiny red foxes, greater access to predation.

Please protect the wilderness qualities of the Pacific Valley and Eagle areas, and leave them closed to OSV winter motorized use, as per Alternative 3.

Thank you for your consideration,

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