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USDA United States Department of Agriculture

U.S. Forest Service
Pacific Southwest Region
Stanislaus National Forest
19777 Greenley Road
Sonora, CA 95370
Voice: 209-532-3671
http://www.fs.usda.gov/stanislaus/

Stanislaus National Forest
Over-Snow Vehicle Use Designation Project (46311)
Opportunity to Comment
Comment Form

Public Open House
Thursday, Sept. 6, 2018: 6 p.m. to 8 p.m.
Stanislaus National Forest Supervisor's Office
19777 Greenley Road, Sonora, CA 95370

36 CFR 218.25 Comments on Proposed Projects and Activities

Requirements. To be eligible to submit an objection, individuals and entities must provide the following during the comment period:

NAME (LAST, FIRST)	WITTMAN, JEFF Dr.
POSTAL ADDRESS	708 MONO Way
EMAIL ADDRESS (Recommended not Required)	vetjeff@mac.com
SPECIFIC WRITTEN COMMENTS *Specific written comments should be within the scope of the proposed action, have a direct relationship to the proposed action, and must include supporting reasons for the responsible official to consider.*	see attached (continue on back if needed)
SIGNATURE	

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OFFICE (209) 532-PETS
FAX (209) 588-8822

Stanislaus National Forest OSV Use Designation Project (46311) Comment:

My name is Dr. Jeff Wittman and I have lived in Tuolumne County since 1973. I attended the University of California at Davis for undergraduate with a degree in animal physiology and veterinary science. I went on to veterinary school at Davis where I completed my doctorate in veterinary medicine. I learned to ski at dodge ridge through the local elementary school programs and both cross country ski and downhill ski. I also snowmobile and have a cabin in the Long Valley area off of forest road 5N01. I am a stakeholder in the OSV plan and I have a unique perspective since I am a veterinarian and have a sincere love for animals and the environment!

I am opposed to the preferred alternative 5 for the following reasons:

1. I have heard much debate about the Sierra Nevada red fox. I have seen many cookie cutter submissions in your comment page with identical wording (see attached) making assertions that I find ludicrous. These comments suggest that the tracks of snowmobiles are being used by coyotes to prey on red foxes in the Sonora Pass Area as well as the Eagle meadow area. I can assure you as a scientist, and veterinarian that this is not happening. I live at the cabin for weeks at a time in the winter at 8000 feet. When you spend that much time in the high country you become acutely aware of the animals around you, especially when you are a veterinarian. In my 30 plus years in the high country I have never ever seen a coyote let alone one walking on a snowmobile trail. Secondly, there have not been ANY photographic sightings of red fox in the eagle meadow, long valley, sardine meadow or red rock meadow areas off of 5N01. I have satellite internet at my cabin and have multiple camera's with motion detection. The only wildlife I see are primarily snowshoe hares. This is NOT to assert that there have not been sightings near Highlands lake and Yosemite National park. I reviewed a letter written to Phyllis Ashmead (Stanislaus OSV Project Team Leader) by Benjamin Sacks, Ph.D. from the UC Davis Mammalian Ecology and Conservation Unit. He had concerns but they were primarily based on misinformation , and I quote: "I should like to suggest that grooming all the way to the pass, rather than stopping at the gate below, could significantly impact the foxes we already know to center their activity around Sonora Pass". This has never occurred and is NOT proposed. In addition he admits "we have little data on the potential direct and indirect effects of the snowmobile activity on behavior, reproductive functioning, or survival of Sierra Nevada red foxes." He was also confused in multiple area's of his letter where he believed the plan was opening new, previously closed areas to OSV use. He further admits that studies in the Rocky Mountains also suggest that snowmobile trails increase coyote access. I must take issue with this last statement. To assert that a study in the Rocky Mountains has ANY relevance in the Sierra Nevada range is ecologic malpractice. Secondly, if he understood

snowmobiling the "trails" he references in this study are very different than the "tracks" that a snowmobile leaves in the back country on deep unpacked snow. The compaction level is significantly different. Lastly, show me the sightings of coyotes on snowmobile tracks - he can't. That is why his concern was mostly centered on groomed trails made by the same machines used at our ski resorts. To limit access to the area north of the HWY 108 road at the top of Sonora Pass is not warranted and there is no data to suggest the need. In addition, there is no way a snowmobile rider will be able to discern where the road is in winter. The natural bowl that exists at the top of Sonora Pass is a favorite place for riders to go. The small section to the north of the road represents on a extremely small fraction of the known habitat of the Sierra Nevada red fox. There is adequate habitat already protected by wilderness area's to the north and to the south. We should not take away half of the OSV area riders use at the top of Sonora pass to preserve an area that represents less than one percent of red fox habitat in this forest (and that is a generous estimation). Alternative 4 already decreases impact on **potential or possible** habitat by 35.3% based on your draft environmental impact statement. In addition, we should also not change the OSV plan because this area might be potential wilderness area in the future. We should let Congress make that determination and not get ahead of our legislature, that is their job. I know for a fact our local Congressman is opposed to any further expansion of the wilderness areas.

2. The unique "Near Natural" designation that exists was primarily proposed in 1991 to apply to **OHV use in the summer** (I have talked to multiple people who were at these meetings). It was designed to prevent intrusion off of existing roads and the creation of new roads and impacts to the area. This does not apply to OSV use in the winter. The snowmobile never contacts the soil and the impacts are insignificant. I have yet to see a study showing an impact. Opponents of this plan site research on their website that is 20 to over 40 years old. One frequent study sited "Effects of Snowmobile Use on Snowpack Chemistry in Yellowstone National Park, 1998", Ingersoll, George P." was used to assert pollution from the snowmobiles. They conveniently forget to mention that the pollution was ONLY found on the roads (which were much more heavily traveled -see attached) and below detectable levels in the backcountry (which is what we are talking about in our forest plan). Amazingly, they deceptively fail to mention the most important part of this paper, the conclusion (attached) and I quote: "Preliminary analysis of snowmelt-runoff chemistry from five of the snow-sampling sites indicate that elevated emission levels in snow along highway corridors generally are dispersed into surrounding watersheds at concentrations **below levels likely to threaten human or ecosystem health.** We also must remember that this is a study from 20 years ago in yellowstone on roads with immensely more traffic than HWY 108 (and especially our near natural areas) and that there have been significant improvement in snowmobile emissions and fuels in the last 20 years (especially here in California). We have used these areas since 1991 because the plan presented at that time applied to summer OHV use (and subsequently morphed which is another issue of debate). It has not been illegal and we would have not used these areas if it was. I would request that the areas we currently ride be included OSV plan.

3. Wilderness area already makes up over twenty five percent (25%) of the forest. There is adequate habitat protection and the wilderness areas provide cross country skiers more than adequate forest to avoid snowmobile conflict. The area they want closed in Alternative 3 is the all the area around my cabin. I literally could snowmobile to my cabin (because you could not prevent access) however, I could never leave my property. Obviously I would pursue litigation and congressional action because the reason I purchased the cabin was for winter access and snowmobiling. Any reduction in OSV access in our area is opposed by myself and the other 80+ property owners because this reduction would impact our use and decrease our property values.

4. The boundaries of alternative 5 are impossible to for any snowmobiler, even the most experience, to identify and follow. Your plan must use natural landmarks that a rider can easily identify. The current wilderness area boundary (ridgeline) to the south of our cabin is a good example.

5. Most skiers use access points in the pinecrest area. Snowlands own website lists a map with 14 trails from this area. Not one trail or reference is made to any trail from the snowpark. Skiers rarely come to the snowpark and never come to our area in Eagle meadows. The conflict they mention is contrived to further their agenda to eliminate all snowmobile use in the Sierra Nevada. This is public use forest, not exclusive use forest. We must all share and take care of this resource.

In conclusion, **I request the selection of Alternative 4** as the only map that balances fairly the use of all stakeholders. I ask that when you review comments (which I already have) look at who truly is a stakeholder in this proposal. Look at the preponderance of evidence presented by individuals who have given much thought to the issue. This is in contrast to an organization issuing a "cattle call" response with instructions on what to say and how to do it. I am not responding to a website or email campaign like the opposition. I thank you for taking the time to read my comments.

Sincerely,

Jeff Wittman, B.S.,D.V.M.

(252 ng/L near Tower Falls) at Yellowstone are far less than the established standards for water consumed by humans (less than 4 percent and less than 1 percent, respectively).

CONCLUSIONS

Snowpack-chemical analyses for ammonium and sulfate have proven to be repeatable indicators of snowmobile use in Yellowstone National Park and in Colorado, and the hydrocarbons benzene, toluene, and xylenes correlate well with patterns observed in 1998 for ammonium and sulfate in the park. Concentrations of ammonium and sulfate at the sites in snowpacked roadways between West Yellowstone and Old Faithful were greater than those observed at any of 50 to 60 other snowpack-sampling sites in the Rocky Mountain region and clearly were linked to snowmobile operation. Concentrations of ammonium, sulfate, and hydrocarbon compounds found in gasoline correlate with snowmobile use and traffic levels; where traffic volumes per day were greater, so were chemical concentrations. Thus, these combined analyses of chemistry of Yellowstone snowpacks are good indicators of the effects of high or low snowmobile traffic levels in the park. These chemical data establish important baselines for future evaluations. Further, these results indicate that snowmobile use along the routes originating at the South and East Entrances, and not including the immediate area (within 1 km) surrounding Old Faithful, may not be substantially affecting atmospheric deposition of ammonium, sulfate, and hydrocarbons related to gasoline combustion.

Preliminary analyses of snowmelt-runoff chemistry from five of the snow-sampling sites indicate that elevated emission levels in snow along highway corridors generally are dispersed into surrounding watersheds at concentrations below levels likely to threaten human or ecosystem health. Localized, episodic acidification of aquatic ecosystems in these high snowmobile-traffic areas may be possible, but verification will require more detailed chemical analyses of snowmelt runoff.

not back country

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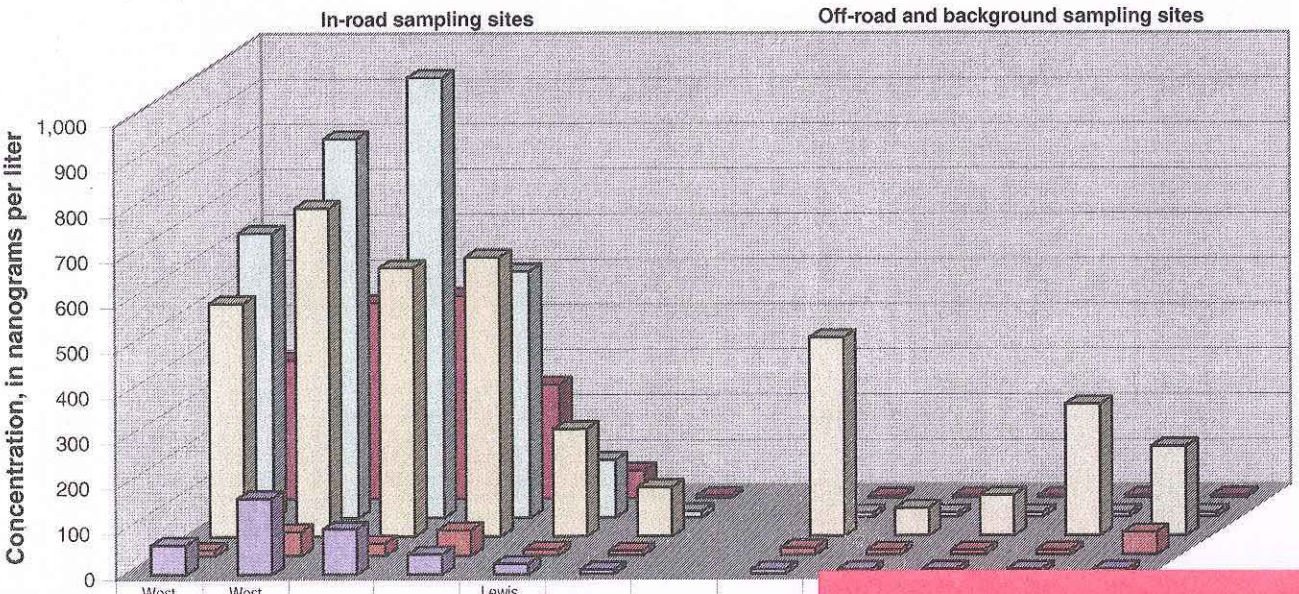


	West Yellow-stone (in-road)	West Yellowstone (8 km east in-road)	Old Faithful (in-road)	Biscuit Basin (in-road)	Lewis Lake Divide (in-road)	Sylvan Lake (in-road)		Old Faithful (1,000 m)	Y (8
benzene	64.3	167	99.3	43.8	23.6	10		<10	
MTBE	12.2	52.2	27.2	55	12.9	10		16.4	
toluene	515	726	594	617	237	108		438	
m- & p-xylene	629	837	973	544	127	13.8		<10	
o-xylene	307	434	449	253	62.2	6.5		<5	

Figure 8. Hydrocarbons in snow on snowmobile-packed roads and off-road sites.

Below detectable limits
Except around old faithful
for Toluene.

Issue was with
road use. See
picture below

Date submitted (Pacific Standard Time): 10/7/2018 5:07:00 PM
First name: Patricia
Last name: Puterbaugh
Organization: Lassen Forest Preservation Group
Title: Yahi Group Sierra Club
Official Representative/Member Indicator:
Address1: 1540 Vilas Rd.
Address2:
City: Cohasset
State: CA
Province/Region:
Zip/Postal Code: 95973
Country: United States
Email: pmputerbaugh@yahoo.com
Phone:
Comments:
I have written extensive comments on the Lassen National Forest OSV Management Plan as I am more familiar with the Lassen National Forest. These same issues below were also issues in Lassen. In Lassen we also have the Sierra Nevada Red Fox and American Marten. These sensitive, elusive animals need at least peace and quiet in the winter!! I oppose adoption of Alternative 5 for the Stanislaus Forest OSV Recreation Management Plan. This alternative threatens the wilderness qualities of the scenic Pacific Valley and Eagle roadless areas, degrades quiet winter recreation opportunities in these areas, and threatens the endangered Sierra Nevada red fox. Not only does snowmobile noise disturb sensitive wildlife struggling to survive during bleak winter conditions, coyotes can use the compressed tracks of snowmobiles to access the deep snows of the high country to predate on this rare fox. I urge adoption of Alternative 3 instead, which keeps the Pacific Valley and Eagle roadless areas closed to winter motorized use, retains opportunities for quiet human-powered winter recreation, and protects the Sierra Nevada red fox.

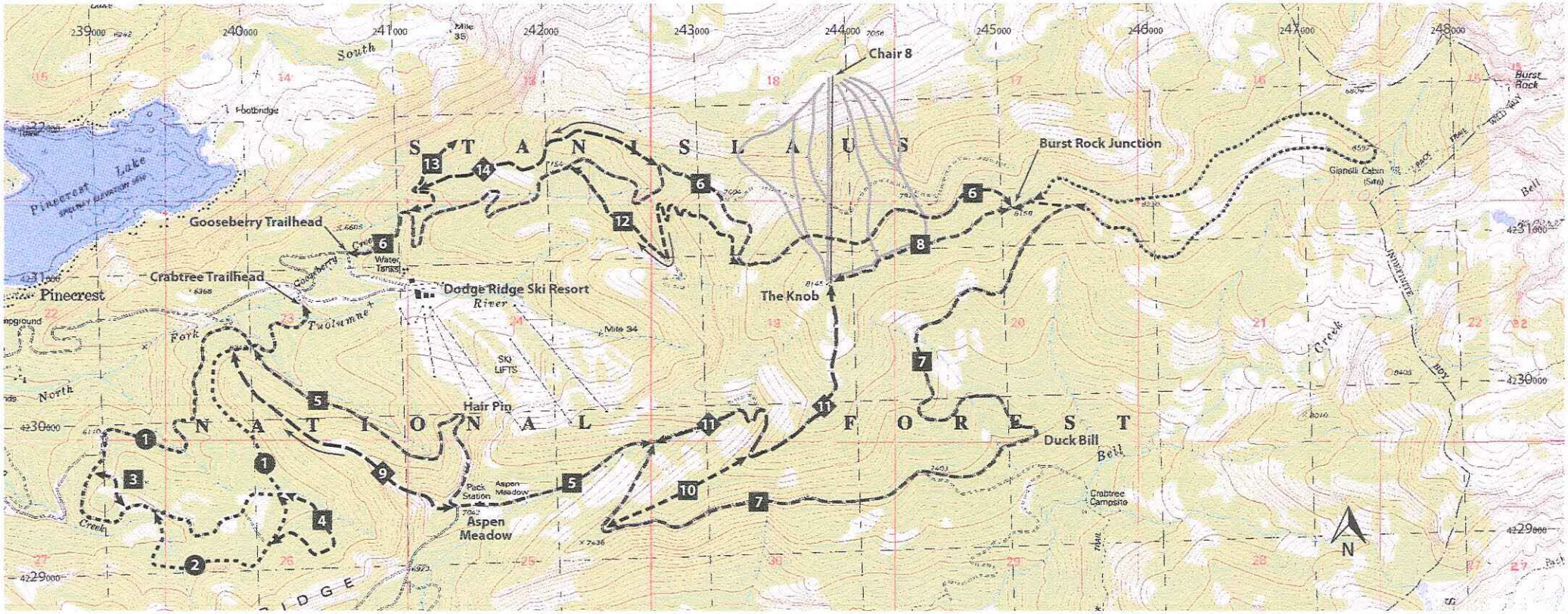
Exact wording!

Real stakeholder?

Date submitted (Pacific Standard Time): 10/7/2018 9:21:17 AM
First name: Jennifer
Last name: Quashnick
Organization: 2/20/2007
Title:
Official Representative/Member Indicator:
Address1:
Address2:
City: South Lake Tahoe
State: CA
Province/Region:
Zip/Postal Code: 96150
Country: United States
Email: jqtahoe@sbcglobal.net
Phone: 5305774233
Comments:
I am an avid snowshoer, and I oppose adoption of Alternative 5 for the Stanislaus Forest OSV Recreation Management Plan. This alternative threatens the wilderness qualities of the scenic Pacific Valley and Eagle roadless areas, degrades quiet winter recreation opportunities in these areas, and threatens the endangered Sierra Nevada red fox. Not only does snowmobile noise disturb sensitive wildlife struggling to survive during bleak winter conditions, coyotes can use the compressed tracks of snowmobiles to access the deep snows of the high country to predate on this rare fox. I urge adoption of Alternative 3 instead, which keeps the Pacific Valley and Eagle roadless areas closed to winter motorized use, retains opportunities for quiet human-powered winter recreation, and protects the Sierra Nevada red fox.

Exact wording!

Real stakeholder?



Designated Trails

Trail No.	Difficulty	Trail Name	One-Way Miles
1	Easiest	Crabtree	4.2
2	Easiest	Sugar Pine	1.0
3	More difficult	Redwood	0.2
4	More difficult	Burnt Bowl	0.6
5	More difficult	Aspen Meadow	2.6
6	More difficult	Gooseberry *	4.2
7	More difficult	Strider II	4.5
8	More difficult	Knob	0.8
9	Most difficult	Ridge	1.2
10	More difficult	Augie	0.7
11	Most difficult	Nordic Run	1.7
12	More difficult	Zig Zag	1.6
13	More difficult	Stanislaus	0.6
14	Most difficult	Rock & Roll	1.1

0 0.5 1 MILE

CONTOUR INTERVAL 40 FEET

Easiest trails. Level to gently sloping.

More difficult trails. Some level terrain, but mostly sloping up and down.

Most difficult trails. Steep up and down, often narrow

* Use caution when crossing downhill ski trails; look uphill and listen before crossing. Move quickly and do not stop until you reach the other side once you are started across downhill trails.

Arrows mark beginning and end of trail

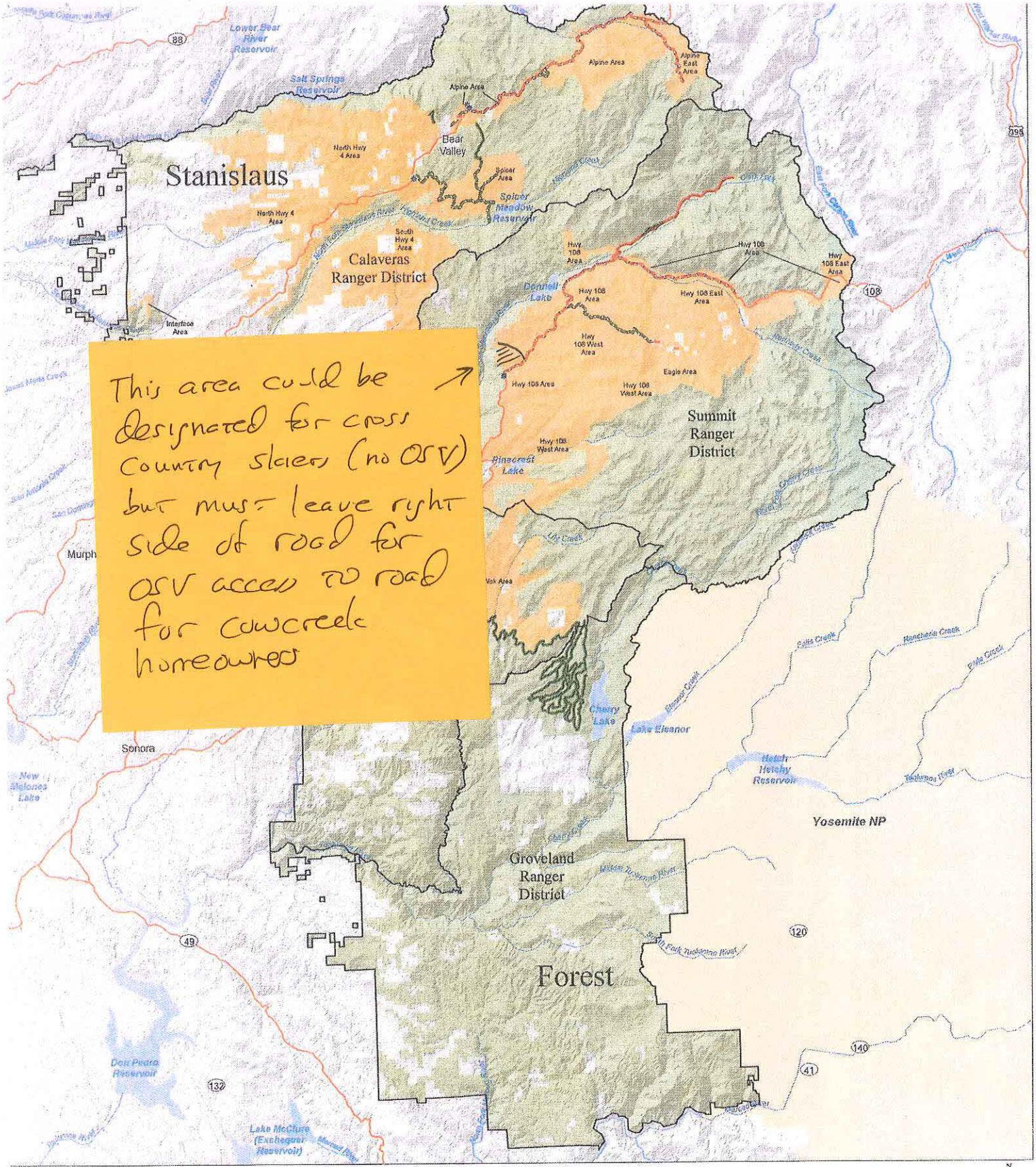
Dodge Ridge downhill ski trails

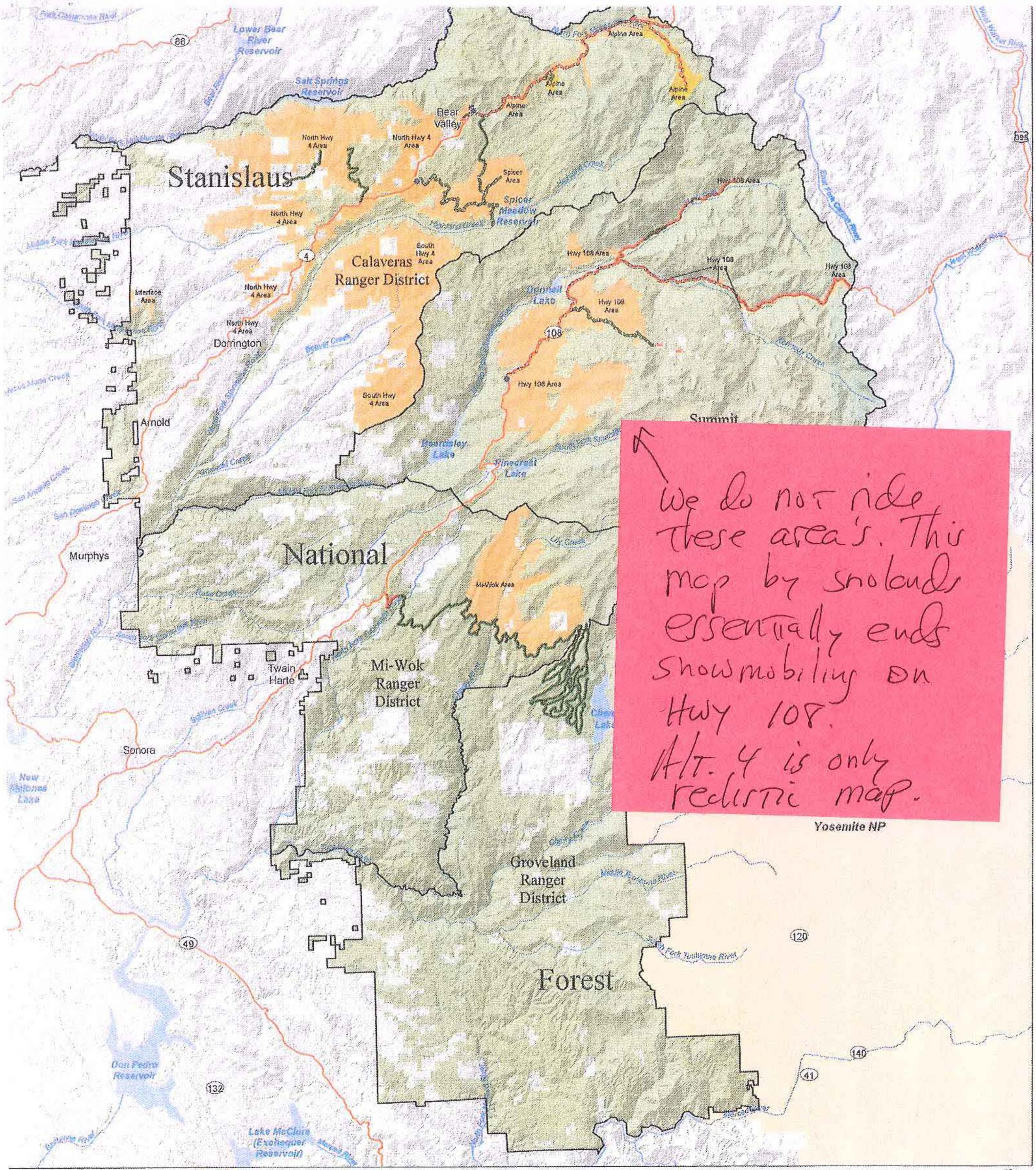
Unmarked and not patrolled backcountry route

Recommended direction of travel

In an emergency dial **911** to reach police or sheriff, highway patrol, fire and rescue service, or ambulance. Phones are located at Dodge Ridge Ski Resort and in Pinecrest near the store.

Stanislaus Nat'l Forest Map of Cross Country Trails


This area could be designated for cross country skiers (no OSV) but must leave right side of road for OSV access to road for cowcreek homeowners
Stanislaus
Calaveras Ranger District
Summit Ranger District
Groveland Ranger District
Forest
Yosemite NP
Bear Valley
Alpine Area
Alpine East Area
Spicer Area
Spicer Meadow Reservoir
North Hwy 4 Area
South Hwy 4 Area
Interface Area
Hwy 108 Area
Hwy 108 East Area
Hwy 108 West Area
Donnell Lake
Eagle Area
Pinecrest Lake
Cherry Lake
Lake Eleanor
Hetch Hetchy Reservoir
Tuolumne River
Clavey River
Middle Tuolumne River
South Fork Tuolumne River
Lower Bear River Reservoir
Salt Springs Reservoir
New Melones Lake
Don Pedro Reservoir
Lake McClure (Exchequer Reservoir)
Sonora
Murph
Stanislaus National Forest
Map 4: Map of Alternative 4
USDA
0 1 2 4 6 8 10 Miles
N
W E
S
SNO-PARK
Winter Creek Crossing
Groomed Snowmobile Trail
Ungroomed Snowmobile Trail
Not Forest Service Jurisdiction - Groomed Snowmobile Trail
Not Forest Service Jurisdiction - Ungroomed Snowmobile Trail
Designated OSV Use Areas
12" depth
Ranger District Boundaries
National Forest System Lands OSV Use Not Allowed



USDA

Stanislaus National Forest
Map of Alternative 3

0 1 2 4 6 8 10 Miles

- SNO-PARK
- Winter Creek Crossing
- Groomed Snowmobile Trail
- Ungroomed Snowmobile Trail
- NJ - Groomed Snowmobile Trail
- NJ - Ungroomed Snowmobile Trail

Designated OSV Use Areas

- 12" depth
- 24" depth
- Ranger District Boundaries
- National Forest System Lands OSV Use Not Allowed