

FORMAL OBJECTION UNDER 36 C.F.R. PART 218

Pinecrest Basin Management Direction - Community Center Forest Plan Amendment and Special Use Permit (#68965)

Objector:	Keely Cashman
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Responsible Official:	Jason Kuiken, Forest Supervisor, Stanislaus National Forest
Reviewing Officer:	Jacqueline Buchanan, Regional Forester, 19777 Greenley Road, Sonora CA, 95370
Date:	07/22/26

I. STATEMENT OF OBJECTION AND REQUESTED RELIEF

Pursuant to 36 C.F.R. Part 218, I object to the June 2026 Environmental Assessment and Finding of No Significant Impact (June EA/FONSI), draft Decision Notice, Forest Plan amendment, J Lot reclassification, Basin-wide commercial-permitting language, and proposed special-use permit for Project #68965.

I submitted timely written comments on May 1, 2026 because my primary concern is the long-term protection of Pinecrest as a National Forest recreation area. I explained that Pinecrest is valued for its natural beauty, forest setting, outdoor recreation opportunities, and small mountain character. I objected to expanded commercial zoning and broader commercial activity, existing overcrowding and parking shortages, traffic, congestion, safety, infrastructure pressure, signage and lighting, visual change, unnecessary commercialization, future precedent, and the gradual loss of Pinecrest's historic and nature-based character. I also noted that visitor services already exist in and around the Basin and asked the Forest Service to deny the proposal or conduct a more thorough review.

The June decision confirms rather than resolves those concerns. It would permanently move the Community Center parcel from Zone 6 Administrative/Utilities Infrastructure to Zone 2 Commercial Use; move the J Lot to Zone 1 Day Use; add Basin-wide language allowing consideration of outfitter-guide, concessionaire, and recreation-event permits throughout all zones outside Zone 5; and authorize coffee and food service, retail, events, overnight rental groups, approximately thirty shared parking spaces, and on-premises beer and wine service. June EA/FONSI, PDF pp. 7-8.

I request that the Reviewing Officer instruct the Responsible Official to withdraw the draft Decision Notice and FONSI and not approve the current amendment or permit. At minimum, the Forest Service should complete a revised, evidence-based environmental review; remove the Basin-wide commercial language and J Lot reclassification; quantify parking, traffic, infrastructure, public-safety, scenic, and cumulative impacts; evaluate existing services and reasonable alternatives; and adopt enforceable limits that protect Pinecrest's recreation, conservation, scenic, and public-access values.

II. OBJECTION ELIGIBILITY AND CONNECTION TO MY PRIOR COMMENTS

My May 1, 2026 comment was timely, project-specific, and stated both the issues I opposed and the relief I requested. The objections below remain within those issues. Where the June documents provide additional details - including the specific J Lot reclassification, approximately thirty shared spaces, overnight rental groups, beer and wine service, the revised all-zones language, and the draft FONSI's no-action rationale - those details materially clarify the same commercial-intensity, safety, parking, infrastructure, scenic, precedent, and long-term-protection concerns I previously raised.

My May 1, 2026 comment	Issue preserved	June decision / new detail
Pinecrest is valued for natural beauty, forest setting, outdoor recreation, and small mountain character.	Scenic integrity, recreation setting, quality of life, and long-term Basin character.	The June decision approves permanent commercial zoning while acknowledging unavoidable infrastructure and aesthetic change over time.
Expanded commercial zoning and broader commercial activity move Pinecrest toward unnecessary commercialization.	Forest Plan amendment, commercial intensity, and permanence of the management change.	The parcel is moved to Zone 2 Commercial Use and a broad commercial permit is authorized.
Traffic, parking demand, congestion, safety, and infrastructure pressures are real existing problems.	Transportation, public safety, capacity, and infrastructure analysis.	The EA acknowledges parking at or above capacity but predicts no measurable traffic, parking, crowding, or wastewater change.
Signage, lighting, and visual changes threaten the rustic and nature-based experience.	Scenic resources, visual character, nighttime setting, and enforceable design limits.	The decision anticipates signage and aesthetic change but provides no disclosed site-specific visual analysis or binding lighting standards.
The proposal creates precedent and may encourage additional similar uses.	Cumulative commercialization and Basin-wide future permitting.	The amendment adds language for outfitter-guides, concessionaires, and recreation events throughout all zones outside Zone 5.
Services already exist in and around the Basin.	Purpose and need, alternatives, existing-service capacity, and unnecessary duplication.	The Needs Assessment lists existing food, retail, lodging, and event services but declares them inadequate without capacity or demand data.
I requested denial or more thorough review prioritizing protection, parking, infrastructure, and historic character.	Adequacy of the EA/FONSI and requested remedy.	The draft FONSI approves the action based largely on assumptions that the effects are administrative, incremental, manageable, and reversible.

III. SUMMARY OF THE DECISION BEING OBJECTED TO

The proposed decision is not merely an administrative update. It changes the long-term land-management designation of the Community Center to Commercial Use, reclassifies a parking and infrastructure area as Day Use, and creates new Basin-wide commercial-permitting direction. It also authorizes a combination of school, food and beverage, retail, events, overnight stays, parking, and alcohol service. June EA/FONSI, PDF pp. 7-8.

The EA describes Pinecrest as one of the Forest's most intensively developed recreation destinations, with a compact concentration of facilities, heavy seasonal use, high levels of vehicle and pedestrian activity, and constrained utilities and infrastructure. It recognizes routine congestion, parking demand that exceeds capacity, overflow parking, repeated circulation by visitors seeking spaces, and pedestrian-vehicle conflicts. Id. at PDF pp. 10-11.

Despite that baseline, the EA concludes that the action will not measurably increase visitation, crowding, parking demand, traffic circulation, noise, waste, or wastewater. Id. at PDF pp. 12-13 and 20. The draft FONSI also weighs the action's acknowledged infrastructure and aesthetic changes against claimed economic and visitor-service benefits and describes the changes as manageable and reversible. Id. at PDF pp. 25-26. Those conclusions are not supported by the quantified analysis necessary for a permanent Forest Plan amendment and broad commercial authorization in a constrained recreation basin.

OBJECTION 1 - THE FOREST PLAN AMENDMENT AND PERMIT AUTHORIZE A SUBSTANTIVE AND PERMANENT INCREASE IN COMMERCIAL INTENSITY

Prior-comment connection: I objected that expanded commercial zoning and broader commercial activity would move Pinecrest away from its recreation, conservation, scenic, and small-mountain values and toward unnecessary commercialization.

The June documents repeatedly characterize the change as administrative because the building already exists and no major new construction is proposed. That characterization focuses on the physical shell rather than the legal and operational change being approved. A permanent change from Zone 6 Administrative/Utilities Infrastructure to Zone 2 Commercial Use changes what activities may be authorized, how the property may function, and the long-term expectations for the site.

The permit would authorize multiple overlapping visitor-serving uses, including food and beverage service, retail, events, overnight rental groups, parking, and alcohol service. The environmental consequences of these uses arise from operating intensity, hours, visitors, employees, deliveries, event surges, overnight occupancy, traffic, waste, noise, and public presence - not solely from construction.

The Forest Service must analyze the maximum reasonably foreseeable use allowed by the permit and amendment, not assume that future operation will remain at an undefined current level. Annual operating plans are not a substitute for disclosing enforceable limits in the decision itself.

Requested resolution: Withdraw the amendment and permit as written. Evaluate a no-commercial-expansion alternative and narrower alternatives that preserve community, school, public-service, or incidental uses without permanently rezoning the parcel for broad commercial activity.

OBJECTION 2 - THE EA DOES NOT SUPPORT ITS NO-MEASURABLE-CHANGE CONCLUSIONS FOR TRAFFIC, PARKING, CONGESTION, SAFETY, OR INFRASTRUCTURE

Prior-comment connection: I specifically raised existing overcrowding, parking shortages, traffic, congestion, safety concerns, and pressure on limited infrastructure.

The EA confirms the baseline I described: parking demand routinely exceeds capacity; existing parking areas operate at or above capacity during peak periods; drivers circulate repeatedly in search of spaces; and congestion and pedestrian-vehicle conflicts occur in concentrated areas. June EA/FONSI, PDF p. 11.

The decision nevertheless predicts no measurable change in parking demand, crowding, or traffic circulation. The record does not disclose trip generation, event attendance assumptions, employee trips, deliveries, school drop-off and pick-up activity, overnight turnover, parking occupancy, parking turnover, pedestrian counts, emergency access, or the combined effects of simultaneous uses.

The approximately thirty parking spaces are described as non-exclusive and shared with the school. That makes an actual capacity and conflict analysis more important, not less. The J Lot reclassification also changes the management designation of a parking and infrastructure area without separately evaluating overflow, resident, employee, visitor, emergency, maintenance, and future permit needs.

The same unsupported approach appears in the utility analysis. The EA concludes that wastewater and stormwater changes would be unmeasurable and that no modeling is warranted, but it provides no baseline loading, reserve-capacity information, peak-season measurements, or projected demand for events, food service, alcohol service, and overnight use.

Requested resolution: Remove the J Lot reclassification and require quantified traffic, parking, pedestrian, emergency-access, water, wastewater, solid-waste, and infrastructure-capacity analysis based on the maximum authorized use and peak-season conditions. Convert every assumption needed for a FONSI into an enforceable permit limit.

OBJECTION 3 - THE DECISION DOES NOT ADEQUATELY PROTECT PINECREST'S SCENIC, RUSTIC, AND NATURE-BASED CHARACTER

Prior-comment connection: I raised visual changes from signage and lighting and explained that expanded commercial activity could diminish Pinecrest's natural beauty, forest setting, historic mountain character, and rustic visitor experience.

The draft FONSI acknowledges that the action introduces unavoidable changes to infrastructure and aesthetics over time and identifies signage or interior improvements as foreseeable modifications. June EA/FONSI, PDF p. 26. Yet the EA does not provide a site-specific visual analysis, viewshed review, sign dimensions, lighting plan, nighttime-effects analysis, design standards, or enforceable limits on exterior commercial appearance.

Visual and experiential effects are not limited to ground disturbance. Commercial signs, illuminated areas, evening events, deliveries, exterior gathering, traffic, and a more intensive public presence can change the character of a forest recreation setting even when the building footprint is unchanged.

The Needs Assessment asserts that the proposal will not alter the character of the Basin, while the FONSI acknowledges aesthetic change. Those conclusions must be reconciled. Pinecrest's rustic quality is a

management value that deserves objective analysis, not a conclusory assurance that commercial activity will remain compatible.

Requested resolution: Prepare a scenic and nighttime-character analysis and adopt binding standards for signage, lighting, exterior activity, event hours, noise, delivery hours, outdoor gathering, and visual compatibility. Do not approve commercial rezoning unless the Forest Service demonstrates that Pinecrest's scenic and rustic setting will be protected.

OBJECTION 4 - THE BASIN-WIDE COMMERCIAL-PERMITTING LANGUAGE CREATES THE PRECEDENT AND CUMULATIVE COMMERCIAL PRESSURE I OPPOSED

Prior-comment connection: I objected that the proposal could encourage additional similar uses and that weakening zoning protections would make it easier for Pinecrest to gradually lose the character that makes it special.

The June revision applies new outfitter-guide, concessionaire, and recreation-event language throughout all Pinecrest Basin zones outside Zone 5. June EA/FONSI, PDF p. 7. This is a Basin-wide planning change embedded in a site-specific Community Center action.

The language is expressly intended to provide additional flexibility for commercial applications. Its reasonably foreseeable effects include staging, client assembly, shuttles, trailers, commercial parking, events, noise, trash, sanitation, conflicts with residents and existing permittees, and additional pressure on already constrained roads, parking, and public spaces.

The EA cannot claim the policy is too general to analyze while simultaneously relying on it as a benefit of the amendment. Because the language opens most zones to consideration of new commercial proposals, it has foreseeable cumulative and precedent-setting consequences that require a separate alternatives analysis and Basin-wide public process.

Requested resolution: Delete the Basin-wide outfitter-guide, concessionaire, and event-permit language from this decision. Consider any future Basin-wide policy through a separate planning process supported by cumulative-use, parking, traffic, sanitation, public-access, scenic, and compatibility analysis.

OBJECTION 5 - THE NEEDS ASSESSMENT DOES NOT DEMONSTRATE THAT ADDITIONAL COMMERCIAL SERVICES ARE NECESSARY

Prior-comment connection: I stated that visitor services already exist in and around the Basin and that National Forest land should not be commercialized unnecessarily.

Appendix A lists existing restaurants, coffee outlets, retail, lodging, rentals, and event facilities at Pinecrest Lake Resort, Pinecrest Chalet, Dodge Ridge, Aspen Meadow Pack Station, Strawberry, and Cold Springs. June EA/FONSI, PDF pp. 28-30.

The assessment nevertheless declares that existing services are not reasonably available or satisfactory without disclosing sales data, capacity, occupancy, operating hours, visitor surveys, unmet-demand measurements, price or access analysis, seasonal patterns, or the ability of existing authorized providers to meet any demonstrated need.

The assessment also reasons that the Community Center is already functioning as a business and therefore has a viable customer base. Existing operation does not establish that a permanent Forest Plan amendment is necessary, that the proposed intensity is appropriate, or that additional services are the best response to congestion and parking limitations.

Reasonable alternatives include improving pedestrian connections to existing services, visitor education, seasonal operating adjustments, targeted expansion within existing commercial zones, parking management, transportation measures, and a limited community or school authorization without broad commercial rezoning.

Requested resolution: Require a documented needs assessment supported by objective demand, capacity, occupancy, seasonality, access, and operating-hours data. Evaluate existing-service and noncommercial alternatives before creating a new permanent commercial designation.

OBJECTION 6 - THE EA DOES NOT ADEQUATELY ANALYZE CUMULATIVE EFFECTS ON RECREATION, CONSERVATION, PUBLIC ACCESS, AND QUALITY OF LIFE

Prior-comment connection: I asked the Forest Service to prioritize recreation, conservation, scenic values, responsible public access, environmental protection, and preservation of Pinecrest for future generations.

The proposed action combines site-specific commercial rezoning, a multi-use commercial permit, a parking-zone change, and Basin-wide commercial flexibility. These components must be considered together and in the context of existing high seasonal visitation, constrained parking, organization camps, recreation residences, businesses, schools, utilities, events, and other permit applications.

Public access can be affected even without physical exclusion. Parking displacement, increased circulation, event activity, commercial staging, congestion, noise, and competition for limited facilities may make ordinary recreation less convenient, less safe, or less available to the public.

The EA repeatedly treats effects as redistribution, perception, public scrutiny, or minor administrative change. That framing discounts the cumulative experience of residents, workers, families, visitors, and recreationists who rely on a finite road, parking, utility, and public-space system.

A permanent planning amendment should be judged against the desired long-term condition of Pinecrest, not only whether each individual effect can be characterized as small. Gradual commercialization may be significant precisely because it occurs incrementally.

Requested resolution: Prepare a cumulative-effects analysis addressing the combined site-specific and Basin-wide decisions, existing and reasonably foreseeable commercial permits, peak-season capacity, public access, recreation quality, scenic character, residents, workers, and future generations.

OBJECTION 7 - THE DRAFT FONSI AND NO-ACTION TRADEOFF RELY ON UNSUPPORTED ASSUMPTIONS AND INADEQUATE MITIGATION

Prior-comment connection: I requested denial or a more thorough review because the acknowledged impacts should not be minimized and Pinecrest's long-term protection should control the decision.

The draft FONSI concludes that no significant effects are anticipated while acknowledging heightened commercialization concerns and unavoidable infrastructure and aesthetic changes. June EA/FONSI, PDF pp. 25-26. It describes those effects as manageable and reversible without identifying the objective thresholds, monitoring requirements, funding, enforcement measures, or restoration commitments that support that conclusion.

The no-action discussion emphasizes missed economic growth, fewer visitor amenities, off-site vehicle trips, visitor satisfaction, and the Basin's competitiveness as a recreation destination. Id. at PDF p. 26. That analysis assumes the asserted need and benefits without quantifying them and undervalues the benefits of retaining established zoning, limiting commercial intensity, protecting scenic character, and avoiding additional pressure on constrained infrastructure.

Quiet hours, annual operating plans, general compliance with county ordinances, and future review of later development are not sufficient mitigation for the permanent zoning and policy changes being approved now. Essential limits must be stated in the decision and permit, supported by analysis, and enforceable before approval.

Requested resolution: Withdraw the draft FONSI. Prepare revised environmental review that fairly evaluates no action and reasonable alternatives, quantifies the claimed benefits and adverse effects, and includes specific enforceable mitigation, monitoring, capacity thresholds, and reopening or suspension provisions.

IV. REQUESTED INSTRUCTIONS TO THE RESPONSIBLE OFFICIAL

To resolve this objection, I respectfully request that the Reviewing Officer direct the Responsible Official to:

1. Withdraw the draft Decision Notice and FONSI and do not approve the current Forest Plan amendment or commercial special-use permit.
2. Remove the Basin-wide outfitter-guide, concessionaire, and recreation-event language and address any future Basin-wide commercial policy through a separate planning process.

3. Remove the J Lot reclassification and evaluate parking and infrastructure management through a separate, parking-specific analysis.
4. Prepare quantified peak-season traffic, parking, pedestrian, emergency-access, water, wastewater, waste, noise, event, and infrastructure-capacity analysis.
5. Complete a site-specific scenic, signage, lighting, nighttime-character, and rustic-setting analysis and adopt enforceable visual and operating standards.
6. Prepare an objective needs assessment and evaluate existing-service, noncommercial, limited-use, transportation, and parking-management alternatives.
7. Analyze cumulative commercial intensity, public access, recreation quality, conservation values, residents, workers, visitors, and future reasonably foreseeable permits.
8. State enforceable limits on hours, events, attendance, overnight occupancy, parking, alcohol service, exterior activity, deliveries, signs, lighting, noise, waste, and infrastructure demand in the decision and permit rather than deferring them to annual operating plans.
9. Issue a written response to my May 1, 2026 comments explaining how each concern was considered and identifying the evidence supporting the final decision.

V. CONCLUSION

I am not objecting to responsible recreation management or reasonable visitor service. I am objecting to a permanent commercial rezoning, a broad multi-use permit, a parking-zone change, and Basin-wide commercial flexibility being approved without the evidence and enforceable protections necessary for a constrained National Forest recreation area.

Pinecrest is valuable because it remains a forest setting where recreation, conservation, scenic quality, public access, and small mountain character are central. Those values should not be treated as secondary to commercial growth or visitor-destination competitiveness. Once zoning protections are weakened and commercial expectations become established, the resulting change may be difficult to reverse even when a permit can theoretically be modified or terminated.

For the reasons stated above, I respectfully request that the Reviewing Officer sustain this objection and instruct the Responsible Official to withdraw or substantially revise the proposed decision before any Forest Plan amendment or commercial special-use permit is approved.

Respectfully submitted,

Signature: *Keely Cashman*

Keely Cashman

Date: 07/22/26

EXHIBIT LIST AND FINAL ASSEMBLY CHECKLIST

This draft intentionally does not include FOIA materials or separate agency email records.

- Exhibit A - My May 1, 2026 project-specific comments on Project #68965.
- Exhibit B - June 2026 Environmental Assessment, Finding of No Significant Impact, and draft Decision Notice for Project #68965.
- Exhibit C - Any publicly issued legal notice identifying the objection deadline, Reviewing Officer, and approved filing method.