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Organization:

Title:

Comments: Regarding the Stanislaus National Forest Over-Snow Vehicle (OSV) Use Designation:

I am both a backcountry skier and a snowmobiler, who has been recreating on Stanislaus-managed public lands for over 20 years. I've never experienced any conflict with other users. As a skier, I find it easy to access Wilderness or areas unpopular with snowmobilers, if that's the experience I'm seeking. When I do ski near snowmobilers, I find modern machines to be reasonably quiet, and my terrain preferences don't conflict with the terrain preferred by modern snowmobilers. User conflict seems to be manufactured by people who don't recreate on lands managed by the Stanislaus. Maybe these conflicts are real where they do recreate, but not on the Stanislaus. Maybe the manufactured conflict helps them fundraise.

I most often access Stanislaus-managed land from other forests, usually from the HT-managed lands to the east via Hwy 4 and Hwy 108. Sometimes from the El Dorado NF to the north via Deer Valley, and less often directly from the town of Bear Valley. Many other residents of Tahoe, Reno/Carson, and the Eastern Sierra access the Stanislaus similarly.

I'm concerned that your proposed closures to snowmobiles don't really take these travel patterns into account. Alternative 5, the Preferred Alternative (and the others except Alternative 2), seems to have significant closures in the high alpine near Sonora Pass and Ebbetts Pass. Near Ebbetts Pass in particular, open terrain is basically limited to road corridors and valley bottoms - severely limiting high alpine riding opportunities. The majority of open terrain is closer to Bear Valley, requiring an impossibly long drive for anyone coming from Tahoe, Reno/Carson, and the Eastern Sierra.

Near Sonora and Ebbetts Passes, closed designations in Alternative 5 (and the others except Alternative 2) are poorly coordinated with management from the HT. This is a sure sign the closed designations are arbitrary. Why would it be appropriate to close terrain on one side of an artificial line drawn on a map, and feet away on the other side of that line, have the opposite designation? Not because any of the issues identified in the project's Purpose and Need are different just feet away. Instead, it appears the closed designations are arbitrary; decided differently just because of different FS management. Look at Alternative 5's closure of terrain just north of Hwy 108 at Sonora Pass, and closures both north and south of Hwy 4. The Stanislaus should keep these areas open for continuity with your neighboring Forest.

I understand several of these closures are because of your 1991 Plan that designated "Near Natural" areas. Did neighboring Forests do the same, or was this an arbitrary management decision by the Stanislaus? If it wasn't arbitrary then, why did it take almost 30 years for any attempt by the Stanislaus to follow it? Do these areas, after almost 30 years of not being managed according to the 1991 Plan, really still meet the definition? Many of them don't appear to in the summer (Pacific Valley is a great example). In the winter, the designation itself is arbitrary - snow covers the ground and protects soil and plants from damage. Wildlife is less impacted by motorized users than by human powered users (<https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0167259>). The 1991 Plan needs to be revised, and the lands re-surveyed to determine if they even still meet the definition.

Many of these closures are probably also an attempt to appease non-profit groups who you expect to sue if you designate "too much" terrain as open. Because motorized use impacts wildlife less than human-powered (Larson, et al), the only justification would be to reduce user conflict. But nobody skis/snowshoes these high alpine areas near Sonora and Ebbetts Passes unless they have ridden snowmobiles there. Even your own rangers don't get there in the winter, unless by snowmobile. How could you ever enforce these closures? You're setting yourself up for failure, and harder-to-defend lawsuits from these same groups if you can't enforce the

closures you create. This is especially problematic in Alternative 5 from Bull Run to Highland Lakes and north to Hwy 4. The fragmented open/closed designations don't follow any natural terrain barriers, and once on the ground nobody will know what's open and closed well enough to follow the rules. The current Wilderness boundary follows an understandable line, and already does a sufficient job at designating open/closed. You should keep everything in this area open, from the Wilderness boundary to Hwy 4.

The Stanislaus is required to consider climate change in analysis and documentation. But you didn't consider the climate change impacts of closing so much high alpine terrain to motorized use. As climate change and warming cause snow levels to rise, low elevation riding will no longer be as viable (everything west of Bear Valley). Climate change will force more and more riders to the minimal remaining high alpine terrain you have open. Part of this plan should be to maximize that open terrain for future use.

There's a similar elevation problem with your proposed minimum snow depths. Elevation especially, and also aspect to sun and wind, influences snow depths significantly. Snow depth will vary too greatly for your proposed values to be enforceable, or even to do what they intend. It's entirely foreseeable that you will meet the minimum value in one place, and not in another, and vice versa. What if a paved trailhead is sunny and low elevation, but right around the corner there's enough snow to meet the minimum? And why is there any minimum value at all over pavement and dirt roads? That makes no logical sense. None of these values appear to have any scientific backing. The team that wrote the alternatives just made up arbitrary numbers. Where is the research that shows snow depth value X minimizes impacts Y and Z? A far better measure than arbitrary numbers with high spatial variability would be snowmobilers' willingness to ride. If it's deep enough for them to ride \$15,000 machines, they must be pretty confident there's enough snow that they won't impact the ground.

ATTACHMENT: Effects of Recreation on Animals as Widespread through a Global Systematic Review.

ATTACHMENT: Website - Will not open through CARA.