Data Submitted (UTC 11): 10/5/2018 7:00:00 AM
First name: James
Last name: Herron
Organization:
Title:
Comments: OSV

Dear Forest Supervisor Jason Kuiken,

I understand that Alternative 5 is the forest's preferred alternative for future Over-snow Vehicle (OSV) management on the Stanislaus National Forest. In general, I think this alternative does a decent job of balancing appropriate OSV use with protections for non-motorized recreation, natural resources and wildlife.

There are areas critical to several species which require considerable review in the best interests for those species.

I am deeply concerned that Alternative 5 proposes to designate the highly sensitive Pacific Valley and Eagle/Night Near Natural Areas 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 Pacific Valley roadless area, surrounded on three sides by the Carson-Iceberg Wilderness, includes a portion of the headwaters of the Mokelumne River, provides critical old-growth forest habitat for the Pacific fisher and pine marten, and is home to a tiny - recently rediscovered - band of endangered Sierra Nevada red fox. Pacific Creek has been found eligible for Wild and Scenic River Status and supports a population of threatened Lahontan cutthroat trout.

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 rich in Native American cultural values.

According to Stanislaus Forest Plan Direction, dated March 2017, "Management emphasis [in these areas] is placed on providing a natural appearing landscape in a non-motorized setting. Public motorized use is not normally allowed and no timber harvest is scheduled. Wildlife habitat management, watershed protection, dispersed non-motorized recreation, livestock grazing and minerals uses are allowed. The area is characterized by a high quality visual setting where changes are rarely evident... It meets the Forest Service criteria for the Recreation Opportunity Spectrum class of Semi-primitive Non-motorized."

I understand that for many years the forest service has failed to implement appropriate non-motorized management in winter, and snowmobilers have taken advantage of the lack of enforcement. I am disturbed that now, through court-mandated winter travel planning, the forest would propose countermanding the Forest Plan and recent Forest Plan Direction based on inappropriate OSV use and management, rather than using this opportunity to re-establish appropriate management emphasis and desired conditions for these critical areas.

If these areas are officially opened to motorized use in winter, not only will it continue to degrade the quiet winter recreation experience sought by backcountry skiers and snowshoers, it will further diminish the established wilderness character of the areas and will likely have serious adverse impact on threatened wildlife species, in direct contravention of the minimization criteria.

Please amend your preferred alternative accordingly and DO NOT DESIGNATE Near Natural areas as open to motorized use.

Thank you for your consideration,

Sincerely,

James Herron

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