

Data Submitted (UTC 11): 5/10/2019 7:00:00 AM

First name: R

Last name: Behrens

Organization:

Title:

Comments: From: R B

Sent: Friday, May 10, 2019 6:16 PM

To: FS-objections-pacificsouthwest-regional-office <objections-pacificsouthwest-regional-office@fs.fed.us>

Subject: Stanislaus National Forest Over-Snow Vehicle Use Designation

In RE:

Stanislaus Over-Snow Vehicle Use Designation project DEIS #46311 and Forest

Jason Kuiken, Forest Supervisor, Stanislaus National Forest

While I appreciate Supervisor Kuikens language that permits snow mobiling in some near natural areas, I write to object to the signed Draft Record of Decision for reasons below.

In particular, my objection is based on my prior comments not addressed and in light of the newly released and newly updated "Map of Alternative 5-Modified (Preferred Alternative)" that was not previously available.:

My earlier comment: "Forest Service land that does not have an acute management issue objectively impacting a natural resource should be open irrespective of elevation, aspect, or grooming for mountain riders."

I and my fellow riders along Highway 108 object to closing the following areas.

1. The area north of highway 108, West of the PCT out to ridgelines above Golden Staircase at least, and north to the wilderness boundary. Ideally, further West toward Bald Peak should be included as well, however insufficient identification by way of a map was not provided to the public. Maps presented at the public meetings were NOT what they purported to be vis a vis the labels used in the session.

2. The area East of Red Rock Meadow all the way to Relief Reservoir (or as much as the Forest Service has jurisdiction over). There is private property owners out there and their guests, that cannot access their homes in winter if sledding use is prohibited there. Further, the Relief Reservoir itself is a long time sledding destination with unparalleled beauty. The traditional use of this region has no environmental overriding or acute concern mentioned in the analysis.

3. OSV travel management plan provides for riding on groomed and ungroomed trail in the Clark Fork Canyon and along and around 6n06. However, ALL surrounding terrain that is non-wilderness and not in a otherwise designated state, should be included in the Map of Alternative 5-Modified (Preferred Alternative) of the DOR, but it is not.

My other objection is based on my prior comment that wasn't truly addressed:

My earlier comment: "Snow depth and rideable areas should not be based on an arbitrary number, but rather on objective impact concern. A minimum snow depth depends on the water content, consistency and adhesion properties of snow crystals. Mountain sledders know this. Their sleds are expensive and they don't want to break them/overheat them by riding on natural resources. There is a self selecting aspect to OSV travel relative to perceived impacts. Snow, of sufficient consistency (not depth), determines whether to ride or destroy the sled. Snow depth riding depends on weather patterns not on arbitrary numbers."

Ostensibly the DOR states they accounted for concerns like these, but the DOR document indicates the Forest Service is looking for an easy management alternative without really considering the specifics of OSV travel outside of the historical reasons for dealing with OSVs through this travel project.

1. In particular, the DOR signed letter and the analyses lumps "OSV trails and areas" together in the very language of the letter and FEIS. They do not distinguish between "OSV Trails" as one type of travel and "Areas" that snow mobiles travel over. In particular, the very useful distinction between already compacted soil, such as found on forest service roads and non-road forest was not identified so no analysis occurred on the difference and need for actual 'minimization' on those surfaces. Instead arbitrary snow depth is used as a convenient means for efficient management operations and enforcement control which are not required for the project and is an overreach approach given the competing needs of winter recreationalists.

2. Further, where grooming occurs, the sufficient 12 inches of sierra type snow ("Sierra Cement" that is well known), can be compacted down to half that and still never have the rubberized flexible paddles of a snow mobile ever touch the highway for much of the remaining season. The analysis and specialists did not address whether OSV Trails that are groomed or forest roads could be exempt from the "area" analysis that presumes 'ruts' are formed by snow mobiles in California's "Sierra Cement." As a result arbitrary minimum snow depth conflicts with the Forest's mandate to permit recreational activity where minimization is not required.

3. Last, the "season of use" near Sonora Pass in big Snow Years like 2019 would prevent traditional OSV use there in Spring by stopping riding in mid-April when there is otherwise sufficient snow depth even under a 24" requirement. By arbitrarily associating the closure to the BWRA's closure date without even considering a simple process of checking depth, and approving an extended season, again shows the bias to perceived efficiency at the expense of a specific user group. The DOR makes no accommodation whatsoever for extending it, but it would be fully permissible under the Forest Plan requirements.

Remedies for closure of area concerns:

1. Re-evaluate with public input the closure of area north of Sonora pass using updated maps showing where the "proposed wilderness" or habitat concerns are. Narrow riding regions and signage can be otherwise used to establish off limits areas for acute issues. Alternative, open the most commonly ridden areas on the north side of the highway near the existing allocated area for riding.

2. Remove the closure east of Red Rock Meadow to the Relief Reservoir and private property boundaries.

3. Permit riding along side of the Clark Fork road consistent with other areas of the forest. Do not limit to just the road as the maps dictate.

Remedies for Snow depth and season of use:

1. Modify the snow depth requirement based on actual conditions of the underlying surface and snow itself and whether it has or has not been groomed. Surfaces like compacted forest service roads should then be analyzed in light of the surface and snow, not by an arbitrary number.

2. Permit riding on surfaces like highways and paved roads where OSV paddles never touch actually touch soil and where 'ruts' are impossible.

3. Add a provision for extending the season of use to limited areas at higher elevations where snow conditions are sufficient to minimize any perceived impact.

Sincerely, with appreciation for your time,

Rob Behrens

PO Box 273

Twain Harte, CA 95383