Data Submitted (UTC 11): 8/10/2015 12:00:00 AM
First name: Jeff
Last name: Erdoes
Organization:
Title:
Comments: August 10, 2015

Phyllis Ashmead
?Stanislaus OSV Project Team Leader
Stanislaus National Forest?
19777 Greenley Road?
Sonora, CA 95370

Re:?
Stanislaus National Forest (SNF) June, 2015 Proposed Action for designation of selected roads, trails and areas open for OSV use, and snow trails to be groomed for OSV recreation.

Dear Ms Ashmead and Forest Planning Team,?
Thank you for accepting my comments on Stanislaus National Forest's proposed action.

My interest in your over-snow vehicle use designation project derives from years of hiking, snowshoeing, skiing and occasionally even driving snowmobiles across snowy mountains of California and Nevada. My multi-use pursuit of wholesome recreation on national forests hereabouts is a huge privilege and benefit for which I am most grateful, and I hope that wholesome recreation will be sustained for everyone into the future.

In that spirit I would like to offer some suggestions which I believe will improve SNF's forthcoming OSV travel management proposal, including provision for sustainable practices of unbound (unsupervised off-trail cross-country) OSV recreation.

For that purpose I've prepared my comment as a pdf document which I attach herewith. (File name = SNF scope commt, 8-9-15 JE). I have also created, and submit now, a supporting document file-named ACSA's myths, July, 2015.

Thank you all for accepting my comments on Stanislaus National Forest's proposed action.
Sincerely,

Jeff Erdoes
Carson City, Nevada

August 9, 2015 Phyllis Ashmead
Stanislaus OSV Project Team Leader
Stanislaus National Forest 19777 Greenley Road
Sonora, CA 95370

Re:
Stanislaus National Forest (SNF) June, 2015 Proposed Action for designation of selected roads, trails and areas open for OSV use, and snow trails to be groomed for OSV recreation.

Dear Ms Ashmead and Forest Planning Team,

Thank you for accepting my comments on Stanislaus National Forest's proposed action.

My interest in your over-snow vehicle use designation project derives from years of hiking, snowshoeing, skiing and occasionally even driving snowmobiles across snowy mountains of California and Nevada. My multi-use pursuit of wholesome recreation on national forests hereabouts is a huge privilege and benefit for which I am most grateful, and I hope that wholesome recreation will be sustained for everyone into the future.

In that spirit I would like to offer some suggestions which I believe will improve SNF's forthcoming OSV travel management proposal, including provision for sustainable practices of unbound (unsupervised off-trail cross-country) OSV recreation.

Underlying the need for change here is the plain fact that in little more than two decades OSVs have evolved from simple conveyances into a variety of costly, high-performance specialty vehicles. Moreover, in national forests of the Sierra Nevada, OSVs are now often purpose-built and sometimes also modified for aggressive off-trail cross-country operation.

Each motorist thus equipped enters the forest with a super-sized demand for forest resources: ten times more terrain, and immeasurably more atmosphere, per visit than a traditional pedestrian visitor on the snowy forest. Now that powerful motor vehicles can penetrate the most remote reaches of NFS lands during the cold season - and as snow- season demands on Sierra forests continue to intensify - it is essential for all Sierra forests to get out in front of this OSV tsunami and leave none behind...

I've read SNF's preliminary proposed action referenced above and studied the map. Following are my concerns and my suggestions:

Minimum Snow Depth for Unbound (Off-trail Cross-country) OSV Recreation SNF's proposal to disallow OSV use below 5000' elevation is wise. Below that elevation on the forest, snowfalls are unreliably supportive and typically discontinuous. SNF's proposal promotes OSV sportsmanship by offering a simple standard to curb rock-bottom OSV indiscretions. Likewise, SNF's proposal to allow OSV trail riding with a minimum of 12" of snow is a simple standard which is reasonably protective of graded travel ways.

Unfortunately, with one tiny exception, SNF proposes also to normalize just 12 inches as the minimum snow depth for unsupervised off-trail cross-country OSV motoring. In doing so, SNF fails, on upper reaches of the forest, to apply a reasonably protective standard. By authorizing off-trail cross-country OSV driving in as few as 12 inches of snow, SNF would invite unbound snow specialty motorists to gin up resource damage which is not only avoidable, but is practically immune from control via enforcement.

Considering the snow variability that always occurs across extended reaches of mountainous terrain, and that specialty OSVs can 'go deep' with the poke of a throttle, SNF's proposal to ordain unbound OSV play in just 12 inches of snow seems ignorant of the forest's duty - newly affirmed in TMR subpart C - to minimize OSV impacts.

< Long-tracked, high-power snowmobiles are designed to ascend through deep snow drifts.

These vehicles can and do penetrate unconsolidated snows to depths exceeding 18 inches - right down to underlying vegetation (here, Tsuga mertensiana on Mokelumne Wilderness) and the confined spaces for unseen forest life.
At this time, OSV horsepower is not capped by EPA or any other agency. Until it is, these ruts can be expected to get even deeper.

SNF should establish a snow- depth standard which allows this unlimited aspect of unbound OSV recreation to

occur sustainably - without contact damage to forest resources.

In its proposal to require 24” minimum snow depth for off-trail cross-country OSV recreation on Stanislaus Meadow, SNF recognizes that 12” of continuous supportive snow pack is insufficient to comprehensively protect all forest resources. Even purported OSV advocates - in this case the Sierra Access Coalition - in comments concerning Eldorado NF ‘subpart C’ scoping, recognize that:

“Snow depth alone is not an adequate indicator of resource protection. For example hard packed snow conditions of 3 inches can provide more protection than 18 inches of bottomless powder.” (SAC, 4/19/2015)

SAC even adds:
“...that [OSV] open areas should be treated differently than groomed trails, because cross country riding requires much greater snow depth for safe travel.” (SAC, 4/19/2015)
(SAC nevertheless rejects predetermined snow-depth criteria for all areas).

In requiring a genuinely protective minimum snow cover for unbound OSV activity, SNF will help confine unbound OSV recreation within a fair snow season which reliably reduces direct OSV contact-impact to myriad forest resources - both when OSV indiscretions are accidental (i.e. inexpert) as well as when OSV indiscretions are deliberate (i.e. opportunistic).

Suggestion:
To minimize impacts of unbound OSV recreation forest-wide, set no less than 18 inches (45 centimeters) of supportive snow as the minimum depth for any and all off-trail cross- country OSV recreation. Adhere to the 18” snow depth standard specified by California’s OHMVRD for grooming of OSV travel ways. Otherwise, for OSV road- bound travel (snow motorists restricted to graded travel ways), affirm 12 inches (30 centimeters) as the minimum depth of snow.

SNF can determine snow depth systematically by setting up a fixed snow course (a wide-spaced array of permanent stakes, each bearing depth-measurement marks) in vicinity of several representative OSV staging areas and travel-ways across the forest. Once the average values obtained from any one of these venues falls below 18 inches, OSV 'fair season' for unbound off-trail cross-country recreation expires at that venue or - more simply, conservatively, and reliably - across the entire forest.

Protect Near Natural Areas from Unsupervised Unbound OSV Recreation
NFS land designated by SNF in 1991 as Semi-Primitive Non-Motorized “Near Natural” should be not be opened for unsupervised off-trail cross-country OSV recreation. So- called "historical OSV use" - particularly in and around Pacific Valley and the Eagle Meadows area - amounts to an acknowledged pattern of repetitious ignorance and violation of the protected status of these areas by uninformed or disobliging OSV motorists.

SNF’s proposal now to open (via forest plan amendment) 13,623 acres of designated Near Natural terrain to unbound off-trail cross-country OSV motoring directly rewards the ‘historic’ rules-optional OSV lawlessness.
SNF’s proposal thus serves double duty:
a) to undermine rarified forest, and b) to undermine the sporting paradigm for OSV recreation expressed in Tread Lightly!

It is cliche that snowmobiles have packed on tremendous horsepower and traction, and that OSV industries do all

in their power to turbocharge demand for their myriad products. A dedicated off-road snow motorist can now drive a new snowmobile longer, faster, farther, higher and more steeply than even ten years ago, and much, much more so compared to 1991.
I copied the frame at left from a snowmobile video hawked on Snowest.com.
Since OSV tracks always vanish, we can rest assured that the self-identified ‘sportsman’ here is just making sure the fish are awake. He is the vanguard of a sport now screaming out for forest service guidance.

Apart from the desire of a handful of snow specialty motorists and their ‘historical use’ expressed at open house sessions, SNF has not demonstrated a genuine need to supply bonus acres for unsupervised unbound OSV activity. As noted, increasing OSV demands and use arise in no small part from snow specialty motorists acquiring ever more powerful snow machines. OSVs will continue to bulk up with horsepower; that fact does not oblige SNF endlessly to accommodate their supersized demands.

Suggestion:
NFS land designated by SNF in 1991 as “Near Natural” should be not be opened for unsupervised off-trail cross-country OSV recreation. But, just in case this troubling allowance finds its way into any OSV management alternative offered by SNF, it should be accompanied by measures to mitigate the impacts of OSV expansion as well as by measures to offset the effects of rewarding OSV lawlessness:

~~ SNF should buffer any proposed NNA opening with a 4-year 'window' during which OSV motorists collectively earn extra indulgence by overwhelming faithful compliance with provisions of SNF’s forthcoming OSV management plan. (e.g. OSV trespass anywhere on SNF, if it does not diminish, disqualifies opening of any Near Natural Area on the forest for another 4-year waiting period).

~~ Require self-issued or other day-use permit for motorized recreational entry on OSV-authorized Near Natural Area

~~ Require 24" minimum depth of supportive snow cover before OSV entry

~~ Disallow OSV fuel caches anywhere on the forest aside from approved containers in approved (sturdy enclosed) structures

Mitigate Impacts of OSV Exhaust
In evaluating the suitability of forest reaches for OSV use, SNF must consider where OSV exhausts will do least harm as well as which trails and forest reaches should be improved by removal or limitation of OSV exhausts.

SNF must recognize that the large areas now contemplated for unbound (off-trail cross- country) OSV activity will assure that OSV exhaust waste - apart from ordinary vehicular exhausts - will not be limited to roadway surroundings but will be widespread.

The mobility of airborne OSV exhaust (e.g. carbon monoxide, benzene, xylene, et al), and the time-release (diurnal, warmth-driven vaporization) of snow-bound OSV exhaust (e.g. benzene, toluene, naphthalene, et al), conspire to deter aerobic activities anywhere near locations where ordinary and common (EPA-compliant) OSVs are used - even hours after EPA-compliant OSVs have left the area.1

Significantly, US EPA’s final exhaust standards for snowmobile manufacture are already three years past, and, in any case, do not limit OSV horsepower. EPA's standard for snowmobile manufacture served for several years as

a industry-wide incentive to reduce emissions from new OSVs, but the standard ossified in 2012 - it's exhausted.2

SNF must now anticipate even more powerful 'stretched' OSVs, single- and multiple- tracked variants, etc. That is to say: OSV exhausts are here to stay, and their impacts on the forest are now long overdue for management.

1 To reduce operator exposure, most OSVs release their engine exhaust into underlying snow. Varieties of simple and complex hydrocarbons - some carcinogenic - then vaporize over time from the embedded waste stream, creating a chronic source of second-hand exposure. Again, last (2014-2015) snow season, I've smelled combustion odors and measured carbon monoxide in high alpine terrain more than one kilometer distant from OSV activity.

2 Please see the review titled Information Published by the American Council of Snowmobile Associations is Unreliable which I've prepared and submitted (as PDF) along with the comment here at hand. Among other things, my review shows that, effective 2012, EPA's allowance for outsized exhaust from off-trail specialty snowmobiles is ongoing.

Ordinary (pedestrian) visitors seeking natural conditions on the forest continue to be exposed to noxious combustion exhausts in ambient air - contaminants which persist long after OSVs have left the scene. Exhaust aerosols from ordinary and common (EPA-compliant) OSVs spread toxins including micro-particulates, VOC (e.g. benzene, MTBE), complex hydrocarbon (PAH), and carbon monoxide which degrade and impede all manner of aerobic forest recreation.

Wailing sounds and transient odors are other notorious impacts of OSV acceleration and exhaust, the area-specific affects of which also deserve scrutiny in SNF's forthcoming analysis and in the alternative plans to be considered.

Suggestion: To encourage use on the forest of 4-stroke OSVs instead of ordinary and common EPA-compliant (still noisy, poisonous and stinky) 2-strokes, recreational OSV entry should be reserved at selected trailheads for OSVs with least-toxic emissions.
Such a restriction would yield greatest benefit at venues where terrestrial constraints (including limited parking options) compel pedestrian visitors to share forest lanes with OSV traffic. Trailheads targeted for reduced OSV emissions can be managed with a day-entry permit quota favoring OSVs with least-toxic emissions.

Sustaining OSV Monitoring and Enforcement into the Future
Resource monitoring and law enforcement on large national forests with large ranger districts is spread - thin to scarce - across scores of road and trail heads and hundreds of thousands of acres. This is a famous challenge when, in the months of warmth, motor vehicles are confined to roads. The challenge is magnified when the forest is snow bound. Even more so into the future as specialty snowmobiles and other OSVs are far from done bulking up with even more horsepower and traction.

Suggestion:

SNF must provide for adaptive management in event that law enforcement and monitoring capacities are overtasked by bigger and faster snowmobiles, more motorists, careless practices, and ever more exotic tracked vehicles (which may drive over snow or, increasingly, THROUGH snow). Trailhead entry quotas might be instituted or day- use permits may be required - especially for OSV entry at trailheads which are used repeatedly for motorized violation of designated Wilderness, the PCT, or other protected terrain accessible on, or via, SNF.

Offset the Vehicular Bias of Snow-Groomed OSV Roads and Trails
SNF seeks to exclude from consideration the impacts of snow grooming upon ~ 14 miles of county easements on SNF (i.e. Highland Lakes Road and Clarks Fork Road). I do not understand the rationale for ignoring the effects of this additional snow grooming; such truncation of the analysis appears to be arbitrary. Impacts of snow grooming Alpine and Tuolumne county road easements on SNF should be considered along with impacts of the proposed snow grooming supported with state funds.

Moreover, SNF should acknowledge, in all offered alternatives, the fact that mechanized snow-grooming of scores of miles of forest travel routes is of benefit principally to OSV motorists, and greatly facilitates the increase and spread of OSV activity across the forest. Resultant OSV traffic on and around forest travel ways is hardly attractive to ordinary, non-motorized visitors; rather, for most, it is a powerful deterrent.

Increasingly, small groups of shoers and skiers are happy to sweat for free, day in and day out, in pursuit of fresh air and loose, un-packed snow on the forest. If OSV snow- grooming were suddenly to stop, the unplowed road grades and routes so widely preferred for human travel would progressively be laced with beautiful, well-pitched, reusable (truly shared) paths reaching up to attractive forest locations.

These delightful pedestrian snow trails arise spontaneously, without cost-sharing agreements or tractor fumes, but if SNF turns a blind eye they will be overrun and churned up by unbound, unrestricted specialty motorists.

Suggestion:
To offset the bias toward motorized use inherent in snow-grooming of forest travel ways, SNF should provide additional non-motorized acreage on the forest to support the growing demand into the future for ordinary pedestrian access and recreation. To this end, SNF should adopt as its preferred alternative the proposal offered by Snowlands Network which includes designations to preserve pedestrian use areas now at risk of being overrun by OSV traffic.

An example of such an area is the terrain accessible via Cabbage Patch station. SNF should protect these forest locations for their long-standing value in wholesome snow- season pursuits, and for their capacity to draw and sustain much more visitation per acre than will occur if simply unbound to motorists.

Protect the Pacific Crest National Scenic Trail and Surrounding Near Natural Area Another valuable action would insure that area(s) designated for unbound OSV recreation do not stretch over the Pacific Crest National Scenic Trail (PCT). Ideally, OSV use boundaries will be mindful of pedestrian lanes weaving among heights. A particular example of this is terrain in vicinity of Sonora Pass: SNF NNA which holds a portion of the PCT.

At the behest of Congress, the Humboldt-Toiyabe NF evaluated the Sonora Pass area to establish a OSV crossing of the PCT in the upper ravine of Sardine Creek (HTNF 2010). In so doing, HTNF expressly situated the resulting OSV crossings so as to direct OSV traffic away from neighboring SNF NNA. By adhering to its 1991 LRMP, SNF would honor HTNF’s effort by preventing OSV use of the NNA neighboring Sonora Pass and the PCT thereabouts.

The frame below shows a vignette of the Sierra crest reaching south of Sonora Pass, California, circa 2006 - complex terrain which holds the PCT. (Sonora Pass and CA SR 108 are unseen, hidden by the slope at the bottom of the frame; Leavitt Peak appears at upper left. SNF NNA in the vicinity is seen at the extreme right side of the frame).

The PCT here switch backs up from the pass and angles across the large bowl to gain the crest. Unmanaged, unbound snowmobile traffic has rutted fall lines across the trail route to the extent that ordinary knee-reliant travel has been foreclosed - on, or anywhere approaching, the PCT alignment. Without guidance, unbound snow motorists cut down lawful access and recreation.3

Suggestion:
SNF should adhere to its 1991 LRMP (and the National Scenic Trails Act and the USFS PCT Comprehensive Plan) by preventing OSV travel upon or in immediate vicinity of the PCT. Please consider using as a management model provisions of the OSV management plan developed by HTNF - through NEPA analysis - for the Bridgeport Winter Recreation Area as well as for the PCT neighboring the BWRA.

3 The PCT is intended for pedestrian use in all seasons. The USFS 1982 PCT Comprehensive Plan states: “Snowmobiling along the trail is prohibited by the National Trails System Act, P.L. 90·543, Section 7(c). Winter sports plans for areas through which the trail passes should consider this prohibition in determining areas appropriate for snowmobile use.”

Conclusion:
Stanislaus National Forest’s task here is no less important than it is complex. Nevertheless, I hope, if SNF in this expansive task is mindful of increasing pedestrian demand as well as the potential for scarcely-managed OSV activity to widely degrade forest resources and ordinary visitor enjoyment on the forest, that forest visitors a decade from now who power OSVs across a sustainable system of trails and open areas will thank you as much as every other interest in wholesome public land.

Thank you all now for your attention and for considering my suggestions in your effort. Respectfully submitted,

Jeff Erdoes
Carson City, Nevada

Note:
Accompanying my comment here, and intended to be included as part of it, please also consider the supplementary pdf I’ve prepared which is identified by the file name ACSA’s myths, July, 2015