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Comments: August 10, 2015

Phyllis Ashmead

Stanislaus OSV Project Team Leader Stanislaus National Forest

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Sonora, CA 95370

Re:Comments on Proposed Action of the Over the Snow Vehicle Use Designation Plan.

Dear Ms. Ashmead:

The Tuolumne County Natural Resources Committee appreciates this opportunity to comment the Proposed Action of the Over the Snow Vehicle (OSV) Use Designation plan for the Stanislaus National Forest (STF). The County is pleased with the possible addition of Clark's Fork Road as a groomed snow mobile route; however, the County is concerned with proposed changes that are unenforceable and may discourage recreationists from visiting the area due to the amount of restrictions proposed under this plan. It is recommended that a user working group be established

to meet with STF staff to resolve these issues prior to drafting the Environmental Impact Statement (EIS). Our substantive comments are as follows:

Proposed Action Map

According to the June 2015 Proposed Action, the Forest Service Proposal would be implemented on all of the Stanislaus National Forest as shown on the Proposed Action Map. The map included in the handout materials is difficult to read due to the lack of identifying geographical landmarks. The optional interactive mapping to provide site-specific comments was not accepting comments on the last day of the comment period. Please see the attached screen shot taken at 3:35 p.m. on August 10, 2015. In addition, this potentially useful commenting tool was not widely advertised and very difficult to locate. This is clearly evidenced by the fact that it appears that the Forest Service only received one comment through this venue. We request an extension of the comment period to review and provide additional site-specific substantive comments.

Based on the handout of the Proposed Action Map, there are several obvious concerns:

- At the Eagle Creek winter creek crossing, is there a campground or is there proposed OSV use allowed if there is 24" of snow depth for the creek crossing?
- The visual distinction between groomed and ungroomed trails is difficult to determine. Are the stretches of white trail ungroomed or the portions that are both white and purple ungroomed?

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- The visual distinction between "Proposed OSV Prohibited Areas" and "Wild and Scenic - Wild" is difficult to

determine based on the similarities in the selected colors.

- As explained further below, the categories for the various map designations are unclear. Additionally, it appears that "Proposed OSV Prohibited Areas" and "National Forest System Lands (OSV Use Prohibited)" are uncategorized.

OSV Use Restricted Areas

The Proposed Action Map color codes areas of the Stanislaus National Forest and then categorizes those colors for OSV use or prohibition. However, the Proposed Action doesn't match up with the categories listed on the Proposed Action Map. The categories are:

- Proposed OSV Use Allowed
- OSV Use Prohibited Areas Under Existing Management
- OSV Use Restricted Areas Under Existing Management

The "Allowed" and "Prohibited" categories appear straightforward in their meaning. On the other hand, the "Restricted" category is unclear and undefined by either the Proposed Action Map or the Proposed Action. It would seem that having a third category would mean that OSV use could occur within these designated areas with certain restrictions, something in between "Allowed" and "Prohibited."What activities on various snow depths are going to be allowed or not allowed in the "Restricted" category?

Private Property Access

A number of private residences will be significantly impacted by the Proposed Action and possibly be in violation should they choose to access their residences using well established snow mobile trails . Some of the areas with new OSV restrictions may put these private residential tracts in a near land locked winter status. From the map, it would appear that it will be difficult to know when one has crossed into a restricted OSV zone. Similar to driver expectation on the roads, snow mobile rider expectation applies. What steps will the Forest Service be taking to ensure these property owners have access to their land during the winter?

Near Natural

Since 1991, the term "near natural" has been in the Stanislaus National Forest plan as a land designation but that designation has never been Congressionally recognized or defined as a land management restriction. According to the map, this term is being used as a buffer between the highest density private property and the Emigrant Wilderness, some of which has been a popular snow mobiling area. Not until 24 years after its inclusion in the forest plan is this term being introduced to the public in a way that restricts use.

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One can only guess as to why the use of the designated "near natural" areas is now proposed to be restricted; however, studies have shown that snow mobiles have negligible negative impacts on water chemistry, soil and vegetation compaction, and burrowing wildlife. Studies show that snow compaction caused by snowmobiling does not have a significant impact on the population of small burrowing animals. Rather, the ecosystems of burrowing animals tend to be overwhelmingly affected by natural forces such as wind-induced compaction, early and late snowfalls, and temperature fluctuation resulting in thaws and freezes. We are more than happy to

provide links to these studies upon request.

Conclusion

If the Proposed Action is enacted as-is, OSV recreation in Tuolumne County will be impacted into the future. It will be difficult to identify and enforce the proposed restricted boundaries. The Tuolumne County Natural Resources Committee recommends delaying any development of the EIS until after a user group has been established and the issues regarding the residential housing tracts are resolved.

Pursuant to 36 CFR § 219.4(a)(1)(iv), the County looks forward to working with the Forest Service to address the expansion of a snow mobile route on Clark's Fork Road as well as addressing the issues identified in this letter. A response to the requests contained in this letter is appreciated.