

Data Submitted (UTC 11): 8/10/2015 12:00:00 AM

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Comments: From: KEVIN RICE [mailto:kjrice@ucdavis.edu]

Sent: Sunday, August 09, 2015 4:16 PM

To: Ashmead, Phyllis -FS

Subject: OSV Use Plan - Some concerns re: wildlife impacts

Dear Ms. Ashmead,

Thanks to you and the Forest Service for the opportunity to comment on the recent OSV proposal. Although I am not a snowmobile enthusiast, having recently moved to Tuolumne from Davis, I truly appreciate the beauty of the Stanislaus Forest and I understand that it is important to provide winter time recreation opportunities to a diversity of stakeholders.

My primary concerns relate to the proposed almost 13,000 acre extension of snowmobiling into the currently designated non-motorized Pacific Valley and Eagle/Night Near Natural Areas. First, an apparent justification for this extension based on unauthorized "historical use" seems almost like a reward for "bad behavior"!

Second, I am concerned about the potential impact of snowmobiling on the wildlife during a season when species are already fairly stressed by tough winter conditions. I freely admit I am not a wildlife expert but I figured that there might be some research out there that relates to the potential impacts of snowmobiling on wildlife species; in particular I was interested in the potential effects on pine martens and/or Sierra red fox. Although I couldn't find a lot of research out there I did find a couple of studies that I think are relevant. I've attached both for your reference. The first one on pine martens is mostly negative results (i.e. no statistically detectable effect of snowmobiles on marten occurrence) but the authors (BTW both lead authors are USFS scientists) admit that their small sample size reduces the power of the study and they argue that much more work needs to be done especially in terms of monitoring stress levels. More importantly, in the final paragraph of the paper the authors suggest that it is important to have non-motorized areas that are next to areas that allow snowmobiles in order to facilitate the persistence of martens in diverse landscapes. To me, this sounds like a VERY good justification for keeping the current non-motorized designation for the Pacific Valley and Eagle/Night Near Natural Areas.

The other study from Utah is a really interesting one that concludes that snowmobile trails facilitate the movement of coyotes into deep snow areas that they normally can't get to in the winter. In this study, the authors concluded that this would increase competition between coyotes and the Canada lynx (an endangered species). I would imagine that because coyotes are known to prey on martens (and maybe Sierra red foxes?), increasing coyote access to martens and foxes in the winter via packed snowmobile trails is probably not a good thing.

In general, both of these studies seem to indicate that we really should know a lot more about impacts of snowmobiling on wildlife before expanding this activity into previously non-motorized habitat.

In sum, although I have no real problem with much of the OSV proposal, I would strongly urge you and your team to NOT extend snowmobiling into Pacific Valley and Eagle/Night Near Natural Areas.

Thank you for your efforts and allowing this public feedback.

Dr. Kevin Rice
Ponderosa Hills
Tuolumne, CA

Attachments:

Effects of OHV on Martens.pdf

Snow Mobile trails and coyote invasion of lynx habitat