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First name: Thomas

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Organization: Central Sierra Audubon

Title:

Comments: From: Thomas E. Parrington [mailto:eattep@sbcglobal.net]

Sent: Friday, August 07, 2015 2:54 PM

To: Ashmead, Phyllis -FS

Subject: Over-Snow Vehicle Use Designation (46311); Scoping Comments.

Dear Ms. Ashmead:

I tried your website for comments, <http://www.fs.usda.gov/project/?project=46311>, and prefer to use email rather than complete that form. The above website that I pulled up stated incorrectly that the time for comments had expired but the material received at your meeting on July 22 and as stated in that meeting, the comment period ends August 10, 2015.

I am delivering on Monday to your Sonora office the original signed letter but have attached in Word form that letter with comments on behalf of Central Sierra Audubon Society in letter dated August 7, 2015

Tom Parrington, President, Central Sierra Audubon Society

August 7, 2015

BY EMAIL & HAND DELIVERY

pashmead@fs.fed.us

Stanislaus OSV ID Team Lead

Attn: Phyllis Ashmead

19777 Greenley Road

Sonora, CA 95370

Re: Over-Snow Vehicle Use Designation (46311); Scoping comments

Dear Ms. Ashmead:

Thank you for the opportunity to respond to the above referenced Over-Snow Vehicle (OSV) Use Designation. On behalf of Central Sierra Audubon Society (CSAS), I offer these comments and concerns which need to be addressed in the Draft Environmental Impact Statement (DEIS).

The project is intended to analyze the effects of grooming snow trails for OSV use with a goal to provide access, minimize impacts to natural resources, avoid conflicts among various uses, and provide for the safety of all visitors.

We realize that you must balance the needs for recreation with sustaining natural habitats and open space. This is a time when open spaces and natural habitats are disappearing at an alarming rate and water quality is also at risk.

As noted in your proposed OSV Designation, all Wilderness Areas are off limits to OSV use. In addition your current Forest Plan for Near Natural Management as referenced in footnote 1 on page 4 provides that "Emphasis

is placed on providing a natural landscape in a non-motorized setting". However, the proposed designation would open both the Pacific Valley and Eagle/Night Near Natural Areas to OSV use in direct contradiction of the existing Forest Plan.

We are opposed to opening both of the above Near Natural Areas to OSV use which would likely preclude future inclusion of such areas as Wilderness Area even though such areas are contiguous to the existing Carson Iceberg or Emigrant Wilderness. Opening of such areas makes illegal access easier into the existing Wilderness areas. Even if not accessed by riders, the noise from OSV use will impair the wilderness experience for those who chose to use their own power to snow shoe or cross country ski such Wilderness areas.

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Attn: Phyllis Ashmead

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Please address the following in the DEIS:

First, although the Forest Service has a multiple use approach to forest management, for Near Natural areas and Recommended Wilderness, the observations and concerns regarding OSV use by the Fish and Wildlife Service in their article on Snowmobiles and National Wildlife Refuge System Lands are useful. The article states in part:

\*\*Snowmobiles can negatively impact plants, wildlife habitat, wildlife, and other refuge users."

\*\*Snowmobiles pack and crush snow, often damaging plants and overall vegetative structure. Compacted snow can also disrupt the movements of small mammals that live in and use sub-snow habitats."

\*\*Wildlife can be directly disturbed by noise and visual intrusions."

\*\*Snowmobiles are disturbing to other visitors engaged in activities linked to wildlife observation or photography such as hiking, snowshoeing, and cross-country skiing. Many visitors to National Wildlife Refuge System lands seek the special solitude, quiet and naturalness that these areas of protected habitat provide. Allowing snowmobiling may preclude other uses."

\*\*Like any use, once snowmobiling is allowed, it is difficult to prohibit it again regardless of adverse impacts or time and space conflicts that arise." (Emphasis Added)

\*\*The use of off-road vehicles capable of high speeds presents safety concerns for managers, not only for the riders, but also for other users of a refuge. Liability is also a concern. Refuge law enforcement does not have the resources needed to police trail use.

\*\*Even on established trails, a few snowmobilers are inclined to venture off-trail, creating impacts beyond the trail itself. This adds another enforcement burden on refuge managers."

Please address the above concerns in the DEIS which will be prepared for this designation.

Second, beyond the above quoted concerns raised by the U.S. Fish and Wildlife Service regarding Wildlife

Refuges which apply equally to the Near Natural Areas, the opening of Near Natural Areas in the Stanislaus Forest will have a significant impact on species unique to the Stanislaus such as the Red Fox, Marten, and Great Grey Owl. During the winter, owls hunt for under snow prey such as voles by relying on sounds. The noise generated by OSV use can

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interfere with such hunting and adversely affect this much endangered species. In the Pacific Valley area, the meadows surrounding the Highland Lakes and other nearby meadows are habitat for the endangered Yosemite Toad. Although the noise from OSV use may not disturb this species, the risk of pollution in its environment is a great concern. Please address these concerns in the EIS which will be prepared for this designation.

Third, please address the impacts to aquatic and terrestrial ecosystems. Pollutants such as polycyclic aromatic hydrocarbons are stored within snow packs. These accumulations are then released into watersheds and studies have shown that higher deaths rates for aquatic insects and amphibians can result.

Fourth, please address the impacts to water quality. The Stanislaus National Forest watersheds are very important. It has been shown that pollution from snowmobile engines settle into the snow pack and are released into the groundwater and surface streams during snow melt.

Fifth, enforcement action requires future funding which is not assured, especially in light of the recent Congressional actions reducing the Federal funding for many Departments. Operating snowmobiles off the trail creates impacts beyond the trail and a number of the proposed boundaries are not well defined which would make it challenging for riders to comply with the nearby boundaries. Please address these concerns in the EIS which will be prepared for this designation.

In summary, CSAS vigorously opposes the proposed amendments to the Forest Plan adversely affecting both the Pacific Valley and Eagle/Night Near Natural Areas because the likelihood that opening of such areas to OSV use would preclude the future designation of such areas as part of our unique Wilderness System; would cause negative impacts to the Red Fox, Marten and Great Gray Owl; would cause negative impacts to aquatic and terrestrial ecosystems and water quality in those areas, and would facilitate encroachment on designated wilderness areas, along with lack of adequate policing.

Thank you for your anticipated attention to this matter. Please enter these comments and protest in your record.

Sincerely,

Thomas E. Parrington, President  
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Sonora, CA 95370  
(209) 928-3835  
TEP:co