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First name: Eric

Last name: Heidman

Organization:

Title:

Comments: RE: Stanislaus National Forest Over-snow Vehicle Use Designation #46311

My name is Eric Heidman from Turlock, California. I'm a life-long resident of the Central Valley, an avid outdoorsman. I am a member of the Sonora Pass Snowmobile Club and 4x4 In Motion Jeep Club and adopters of the Niagara Rim 4x4 trail. We maintain a close, working relationship with the OHV rangers of the Summit District to serve the forest users of the area. From a volunteer capacity, we help open and maintain roads and trails, fix signage, remove trash, etc. My family, friends, and I utilize numerous areas of the Stanislaus National Forest year round. In the winter, some of our favorite place to snowmobile are Herring Creek, Sonora Pass, and Eagle Meadow areas of the Highway 108 corridor. I take great interest in these areas due to the proximity to home and because of the year round access afforded there.

I have reviewed the Stanislaus DEIS' intent, identified issues, and proposed alternatives for the OSV use designation and management plan and have found that each of the five alternatives propose a drastic reduction and limitation to traditional over-snow, public lands access. All alternatives, directly or indirectly, reduce what is already limited open access areas to over-snow travel, disproportionately benefiting users who favor non-motorized recreation. Alternative 2 is an inaccurate representation of current management and Alternative 3 restricts over-snow use well beyond any reasonable balance. Currently, there is a precedent established under present day over-snow management practices that has allowed for a balance of interests. I believe this current status requires little alteration.

Upon closer look, the maps for "proposed" Alternative 1 and "preferred" Alternative 5 have severe implications to off-trail areas where my family, friends, and I often ride.

Those areas include:

- *The Herring Creek Loop including Willow Meadow, Hammil Canyon, Eagle Peak, and the surrounding slopes.

- *5N01 through the Niagara Rim Trail area, Barn Meadow, Eagle Meadow, Long Valley, and eastward to Haypress Meadow as well as 20E08 linking the Eagle Meadows area with Dardanelle.

- *Slopes and open areas south of Kennedy Meadows to Night Cap peak and areas immediately adjacent to Highway 108 from Chipmunk Flat eastward to the top of Sonora Pass and various areas on top of the pass.

Furthermore, the preferred Alternative 5 divides motorized access into a veritable patchwork of open and closed areas, putting unnecessary burden on the over-snow user as well as law enforcement to regulate seemingly arbitrary and poorly delineated wintertime boundaries. The proposed open and closed boundaries create voids (such as in the Herring Creek Loop) in the forest which serve no true value to the interest of non-motorized users who are seeking "quiet enjoyment" and only complicates the legal access opportunity of motorized users. Another example of complicated boundaries are depicted in Alternative 5 in Eagle Meadows, Eagle Creek and Long Valley Creek areas where over-snow use would be kept to basic flat terrain, eliminating many traditionally ridden off trail and slope areas along. Based on current practice, I would support keeping open the entire national forest area between the Emigrant Wilderness and the Carson Iceberg Wilderness open to over-snow travel.

I support additional trail grooming throughout the forest to promote more access for all skill levels and interests. Additional grooming would allow for more dispersed riding opportunities which would reduce any actual or perceived impacts on lower elevation terrain where more concentrated use would have to occur given the restrictions of the various alternatives. The top of Sonora Pass can be great riding, but traveling from the Highway 108 Sno-Park on ungroomed trail is limited in duration and can take significant effort. Grooming

Highway 108 to the top of Sonora Pass would be a great benefit to both on-trail and off-trail riders providing all with a picturesque, high-alpine experience.

The proposals designate many areas to on-trail use only. I personally do not support this. It should be noted that "on-trail only" restrictions would alienate a significant portion (likely great majority) of the current over-snow users in the Highway 108 area. It is these participants who provide an economic benefit to the OHV program, Sno-Park program, as well as to the surrounding community and local businesses. It is also my position that restricting off-trail travel would not be consistent with current management practices and traditional free access that have demonstrated no discernable impact to the area's natural resources.

I am opposed to changing the current open access of previously designated, but unrecognized "near natural" areas. A nearly three decade old management practice has established a suitable track record and successful precedent for protecting this sensitive terrain. In periods where no snow is present, it certainly makes sense to protect these areas when soil and vegetation is exposed and can be disturbed by motorized travel. However, during the winter when these areas are covered by significant snow depth, over-snow vehicle travel has no impact to the soil or vegetation. I can speak to this personally as I have recreated year round in some of the areas of concern and have found that in the summer there is no evidence of damage from winter over-snow travel activities. Furthermore, there seems to be no documented or scientific evidence of direct impact to justify closing terrain that is buried under significant snowpack. I would ask that the Forest Service consider a new designation of "Winter Shared Use" that would officially open near natural areas to permanent over-snow access.

I am opposed to the minimum snow depth requirement of 12" as prescribed in all the alternatives. Snowmobiles represent a significant personal investment and as such, owners like myself take great care in protecting that investment by traveling in snow depth and snow conditions appropriate to the proper cooling of the snowmobile engine and longevity of parts such as tracks, skis, and carbides. That means that snow must be of adequate depth to cover pavement, terrain, and vegetation such that the snowmobile, nor the environment, is not physically damaged during use. Thus as an over-snow vehicle owner, there are already sufficient self-imposed and condition appropriate restrictions adhered to.

The analysis admits that snow depth requirements are quite arbitrary. Scientific measurements would help, but one must consider the location and elevation of such measurements as well as the recreation appropriate for that location. At higher elevation, where substantial off trail riding occurs, there is significantly greater snow depth and coverage than areas of lower elevation, such as where the current Sno-Parks are. Natural variability in elevation and terrain cannot be controlled nor managed with a blanket approach or single point measurement. Thus a minimum snow depth should not be mandated or required, but rather the use of such area should be deemed appropriate by the over snow user who is intimately aware of the conditions present.

Additionally, Alternatives 5 and 1 designate the Mi-Wok and Groveland areas as open to over snow travel and on-trail riding. In typical snowfall years, these low elevation locations would see little access if regulated by a 12" minimum, thus nullifying both as viable use areas and further limiting access for the motorized, over-snow community.

The proposals seek to address the issue of conflict between multiple users, most notably between non-motorized and motorized users. Speaking from personal experience, I support multiple uses of the forest by all users simply because I partake in all forms of use myself. I personally have never witnessed conflict between motorized and non-motorized users sharing the same area. Quite simply, common courtesy and mutual respect is the solution, not segregation and stigmatism. Additionally much of the backcountry areas that are proposed to be closed in the various alternatives are such a great distance from current Sno-Park access points that there are rarely any non-motorized users present.

It should be noted that there are currently 19 Sno-parks across the Sierras which are made possible in part by the OHV funds collected from motorized forest users. All 19 are open non-motorized use while only 11 allow motorized use. This ratio provides non-motorized users ample recreational opportunities for quiet enjoyment, as does the vast network of existing wilderness areas where no over-snow travel is permitted. As a responsible snowmobiler, it should be noted that I respect the boundaries that exist with the multiple wilderness areas in and around the Stanislaus National Forest. Based on these facts, non-motorized use already has a significantly larger share of access to the forest compared to over-snow users. Further limiting over snow-use is unnecessary.

I am also opposed to the end of season designation of April 15th. High elevation supports over-snow travel long after the roadway is plowed and use of such areas as those found just west of Sonora Pass should be deemed appropriate on an individual's assessment of snow conditions.

While I support increased OSV access, I recognize the Forest Service is charged with balancing the interests of all stakeholders along with the conservation of natural resources. However, over-snow travel represents a unique situation in that responsible users leave no trace after the snow melts. Over-snow travel does not require roadways to be built or maintained for access. Additionally over-snow access is performed by a rather limited segment of the general forest using population making its impact to the terrain, wildlife, residents, and other users exceptionally minimal.

Thank you for the opportunity to comment.

Sincerely,
Eric Heidman
Eheidman1@yahoo.com
209 656 6864