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Organization: Great Old Broads For Wilderness Title: Middle California Broadband Leader

Comments: Dear USFS,

I represent Great Old Broads for Wilderness as the Middle California Broadband Leader.

The California chapter (or band) is one thousand members strong and our national organization has nearly 8500 members. Our more than 25 years of history is built on a foundation of protecting public lands for this generation and generations to follow. We are elder women who began this work as an organization in defense of the Wilderness Act. Our mission continues and has evolved with the critical role that wildlands play in ensuring a livable planet for us and all species that depend on public lands for our very survival.

As private citizens and outdoor enthusiasts, our members enjoy public lands across the United States. The Stanislaus National Forest, as our oldest National Forest, is a cornerstone of public lands in California. It contains the headwaters and watersheds for the water supply for millions of California residents. The Forest is an essential resource to offset carbon emissions and a deeply degraded buffer against climate change. It provides habitat for species that are threatened by the sixth mass extinction. In short, this forest is of such importance to so many that the needs and desires of OSV extreme enthusiasts should play a minimal and diminishing role, at most, in the decisions made about the use and designations of the Stanislaus National Forest.

Our members cite first hand experiences of encounters with snowmobiles in non-motorized areas. This trespass cannot be used as a rationale to expand legal motorized use. We fail to see any logic for an increase in legalized motorized use into sensitive habitats. There are areas in the Forest that offer significant opportunities for expansion of Wilderness designation. We need more identified Wilderness areas to offset the National and Global reduction of habitat and forest carbon offset value. Increased OSV use flies in the face of logic and science.

Great Old Broads for Wilderness is an active partner with the Endangered Species Coalition in the efforts to identify and protect migratory corridors. We have lobbied in Washington D.C. to successfully earn bipartisan support of migratory corridor legislation. The expansion of snowmobile use in the Forest disrupts migration and habitat for threatened and endangered species such as the Sierra Nevada red fox, American marten, wolverine, and Pacific Fisher in addition to the numerous other furbearers that depend on the Stanislaus National Forest. This plan must protect the Yosemite Toad and Sierra Nevada Yellow-Legged Frog as required by law.

Snowmobile traffic is poorly monitored, signage is nearly non-existent, and illegal riding is rarely enforced. When snowshoeing or backcountry skiing, the evidence is everywhere that snowmobiles are ridden where they are not allowed and they often ride over the speed limits or what the conditions allow. An expansion of OSV use into an area in which existing laws are rarely enforced and understaffed will only degrade the Forest more.

Great Old Broads for Wilderness calls on the USFS to utilize the research and expertise of NGOs and scientists who have commented on the plan with deep complexity and research. For myself, I can count many snowmobile enthusiasts as neighbors and friends in Alpine County. Yet, I urge the Forest Service staff to resist the influence and outcry of snowmobile extreme sports enthusiasts. Any expansion of designated OSV roads will encourage recreational riders with little or no experience to access the near-primitive areas of the Forest. Increased OSV use in semi-primitive wilderness areas should not be part of a land and resource management plan. The resources of the Stanislaus National Forest must be restored to ensure its habitability and viability as a Forest for perpetuity.

In conclusion, Great Old Broads for Wilderness advocates expansion of Wilderness areas and protections of near Wilderness areas for future inclusion as specified by the Wilderness Act. We urge the USFS to incorporate research and best practices of protection for forest habitat, not the use of a polluting and habitat destroying motor vehicles. We do not accept the expansion of any designated snowmobile access in the Stanislaus National Forest.

Respectfully Yours,

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