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Title:

Comments: Hi,

I am writing to you about the proposed changes to OSV riding areas, after examining the 5 alternatives proposed for Stanislaus NF.

I noticed the doc uses the term "natural areas" multiple times, but fails to define them in a substantive way. Since "natural areas" have no uniform federal, state, or local definition, it is improper to use them universally for decisions of record. For example, the Pacific Valley area has developed structures, vehicle access and supports multiple uses, while still being defined as a "natural area". Other USFS lands near Southern California cities have "natural areas" that allow open fires, campers to parked on loose soil, OHV vehicles, and in some cases livestock. This inconsistency is not only confusing, but does not have a legal precedent for developing travel plans. Since Pacific Valley supports other uses year round to those that enjoy these public lands in a variety of fashions, this would best be served through making the area (and hillsides) a special management area that allows multiple uses to exist, rather base restructions on an arbitrary designation.

Regarding the proposal for minimum snow depth, this has no correlation to snow quality, particularly as elevation changes. As modern sleds and skis are damaged very quickly by riding on mud or dirt, riding on barren ground can often be much more costly (in repairs) than the current USFS fines for breaking this proposed rule.

Additionally, in alternative 5 logging road grades from Dardanelle up to Eagle Meadow along the sides of Eagle Creek are not designated as open. However, Alt 4 recommends this area as open, as the grades have not been slated to be removed (or environmental studies completed to look at removing them). This is historically an extremely popular riding area, and closure of this minimizes many recommendation opportunities for Americans who cannot enjoy these areas by "human powered activity".

I have great concerns about the proposed reductions in riding areas - as I believe they directly conflict with USFS's motto "Caring for the Land and Serving People". As someone who has spent a large amount of my life recreating on public lands and making great friends through those activities, I believe it to be poor policy to restrict land use in this manner from many people who could not otherwise enjoy these beautiful areas. Approximately 20 million Americans (7.1% of the civilian population-PewResearch) have physical disabilities, in addition to over 3 million veterans, all who will never be able to enjoy much human powered adventures on public lands due to their limitations. By reducing riding access, these proposals effectively end their public access to these areas permanently, restricting access to those who are young enough, healthy enough, and lucky enough not to suffer personal or service-related injuries. In order to expand opportunities for this class of Americans, be more inclusive to those are not as fortunate to be in great health as the rest of us (I hiked 6 miles this weekend am thankful to be able to do so!), conflicts with many alternatives in this document with rules to reduce riding reas based "conflict of uses" (which USFS decisions of record based on this argument have been shown to be legally shaky and difficult to enforce). Strategically planning and expanding access such as grooming areas around Hwy 108, and preserving the historical runs such as the areas linking Eagles Meadows to Waterhouse Lake (stopping at the ridge of the wilderness boundary) to Copper Peak, Castle Rock, and the Three Chimneys, allows Americans to continue enjoying public lands, all while enjoying the highly minimal impact of OSV recreation.

I appreciate the opportunity to comment on these changes, and thank you for taking the time to read my input.

Stephen Fly