Data Submitted (UTC 11): 5/10/2019 1:51:11 AM
First name: Ben
Last name: Grassi
Organization:
Title:
Comments: STF OSV Project

Dear Regional Forester Randy Moore,

I am filing this objection to the Stanislaus National Forest Over-Snow Vehicle (OSV) Use Designation Draft Record of Decision ("Draft ROD") of March 22, 2019, pursuant to 36 C.F.R. part 218 and 36 C.F.R. part 219. I filed timely formal comments on the Draft Environmental Impact Statement (October 9, 2018) for the project and therefore have standing to object per 36 C.F.R. § 218.5(a) and 36 CFR 219.53(a).

I am a backcountry skier and Nordic skier. I value the non-motorized winter recreation opportunities and protections for natural resources and wildlife provided by the Stanislaus National Forest. While I support elements of the draft plan - establishing a minimum snow depth restriction of 12" for cross-country OSV travel, setting a season of use at Sonora Pass that is consistent with the Bridgeport Winter Recreation Area, and not designating some popular quiet recreation areas for OSV use - there are many aspects of the draft plan that fail to minimize conflict between OSV use and other uses, and to protect sensitive wildlife species.

In particular, I object to the decision to designate the treasured and highly sensitive Pacific Valley and Eagle/Night Near Natural Areas for winter motorized use. It contradicts a long-standing forest plan direction that those areas are to be managed as non-motorized. Designating these areas for motorized use in winter rewards decades of motorized trespass, degrades the quiet winter recreation experience sought by backcountry skiers and snowshoers, diminishes the areas' exceptional wilderness character, and threatens imperiled wildlife species such as the Sierra Nevada red fox, all in violation of the Forest Service obligation to minimize impacts to those resources.

Remedy: Do not designate Near Natural Areas for cross-country OSV use and do not amend the forest plan direction that those areas are to be managed as non-motorized.

I also object to the draft plan's failure to provide an adequate variety of conflict-free non-motorized recreation opportunities on the forest by protecting the following important non-motorized areas:

- The Herring Creek area immediately adjacent to the Leland Snowplay Area on Highway 108
- Osborne Hill and other accessible terrain to the immediate east and west of Lake Alpine
- The Cabbage Patch and Black Springs and Mattley Ridge, allowing for continued OSV access to remote terrain
- Route 7N02 in the Big Meadow Area

Remedy: Do not designate these important non-motorized recreation areas for cross-country OSV use

Finally, I am concerned about how the Forest Service plans to monitor and enforce designations, especially in remote areas like Highland Lakes and Folger Peak? OSV use can present avalanche safety issues as well as unmitigated opportunities for illegal motorized trespass into adjacent Wilderness.

Remedy: Include adequate monitoring and enforcement protocol in final plan.

Thank you for your consideration,

Sincerely,

Ben Grassi
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