



DEPARTMENT OF PARKS AND RECREATION
Off-Highway Motor Vehicle Recreation Division
1725 23rd Street, Suite 200
Sacramento, California 95816

Lisa Ann L. Mangat, Director

August 10, 2015

Phyllis Ashmead
Stanislaus OSV Project Team Leader
Stanislaus National Forest
19777 Greenley Road
Sonora, CA 95370

Subject: Comment letter regarding Stanislaus National Forest OSV Use Designation.

Dear Ms. Ashmead,

The California Department of Parks and Recreation, Off-Highway Motor Vehicle Recreation (OHMVR) Division appreciates the opportunity to comment on the Stanislaus National Forest Over-Snow Vehicle (OSV) Use Designation scope. The OHMVR Division has a legislative mandate to ensure the citizens of California have sustainable opportunities for off-highway vehicle (OHV) recreation including OSV recreation. The OHMVR Division has a long-standing cooperative relationship with the Stanislaus National Forest in support of effectively managed OSV recreation.

The groomed OSV trail systems on Highway 4 and Highway 108 on the Stanislaus National Forest offer important OSV recreation opportunities in California. These trail systems are extremely valuable recreational resources for the residents and visitors to Alpine, Calaveras and Tuolumne Counties. The OHMVR Division, through the OSV Program, has provided financial assistance in support of the Stanislaus National Forest groomed OSV trail system.

Following are the OHMVR Division comments on the Stanislaus National Forest OSV Use Designation proposed action:

- Groomed trail mileage consistency with OHMVR Division OSV Grooming agreements

The Notice of Intent (NOI) and proposed action identify 58 miles of groomed National Forest System OSV trails. This differs from the OHMVR Division's 2010-2020 OSV Program Environmental Impact Report (EIR) which identifies approximately 70 miles of groomed OSV trails. The forest and the OHMVR Division recognize that the proposed action does not reduce the amount of groomed trails on the forest that are supported by the OHMVR Division. The EIR total was based on the best available information at the time and the discrepancies may be due to legal jurisdiction and improved mapping of the routes.

- Minimum snow depth recommended for OSV activities

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The NOI and proposed action recommend minimum snow depths for use on designated trails, cross-country OSV use, and for snow trail grooming. Snow depth across the landscape can be highly variable and subject to change over the course of a day under the proper conditions. To the extent possible, it would be beneficial to further explain the methods and frequency for determining snow depth. The OHMVR Division also suggests the proposed action specify that depth is determined in uncompacted snow.

These minimum snow depths present several issues regarding implementation and enforcement. The OHMVR Division believes that public information is necessary and preferable to citing uninformed individuals. To that end the Stanislaus National Forest should identify methods to alert OSV users of current snow depths during the winter season.

We appreciate the opportunity to provide these comments and look forward to working cooperatively with the Stanislaus National Forest on the Draft EIS.

Sincerely,



Kelly Long
Equipment/Winter Recreation Manager
OHMVR Division, California State Parks

cc: Christopher Conlin, OHMVR Division Deputy Director