

October 9, 2018

Stanislaus National Forest  
19777 Greenley Road  
Sonora, CA, 95370

RE: Stanislaus National Forest Over-Snow Vehicle (OSV) Use Designation

Dear Forest Supervisor Kuiken,

Thank you very much for the opportunity to comment on the draft Environmental Impact Statement (EIS) for the above-referenced project. I have been an avid snowmobiler, cross country skier, and downhill skier for over 35 years. In the last 10 years, I have also taken up backcountry snowboarding. I have extensive experience in winter recreation activities on the Shasta, Lassen, Plumas, Tahoe, and El Dorado National Forests. Despite my lack of personal experience on the Stanislaus, I have several friends who enjoy winter recreation activities on the Stanislaus and it is truly one of my "bucket list" areas to experience during the winter. So I hope you will still take my comments on the draft EIS into consideration. My comments are as follows:

#### Minimum Snow Depth

My concern with establishing minimum snow depth to determine whether a riding area is "open" is how that depth will be determined and how it will be enforced. Using snow depth from one area along could unnecessarily close an area that has sufficient snow to avoid resource damage. The reverse of course is true, as well. The Forest Service should use the California Cooperative Snow Survey Database, NRCS Snotel stations, and officers that actually ride cross-country to determine the adequacy of the snowpack to avoid resource damage.

#### Reducing Allowable OSV Areas

On the other forests I have experience on (noted in the first paragraph of this letter), the current acreage and management of OSV use allows OSV users to quickly access backcountry areas thus avoiding conflict with non-motorized users who cannot travel as far or as quickly. Reducing the acreage or restricting the management policies only increases the chances of use conflicts. And forcing OSV users into a smaller area only puts more stress on the snowpack in that area. To support a reasonable dispersal of OSV users, I would like to see the following modifications to the "Preferred" Alternative 5 based on conversations with my friends who frequent these areas and my own review of topographic maps:

## Highway 108

1. Open the entire area between Highway 108 and the Emigrant Wilderness Boundary to cross-country OSV use starting near Strawberry and extending to Kennedy Meadow specifically including the following:
  - a. The Willow Meadow and Hammill Canyon areas inside the Herring Creek Loop area.
  - b. Eagle Meadows and the ridge that defines the Emigrant Wilderness Boundary from Waterhouse Lake to Cooper Peak to The Three Chimneys.
  - c. Both sides of Eagle Creek from Highway 108 to Eagle Meadow.
  - d. Both slopes of Long Valley.

While topographic maps indicate some steep terrain that will not be passable by OSV's in these areas, designating the entire area as open to OSV's keeps it simple for enforcement.

2. Extend the designation of Highway 108 as a groomed trail from Kennedy Meadows to Sonora Pass.
3. Do not automatically close the area just west of Sonora Pass to cross-country OSV use on April 15.

## Highway 4

1. Open the entire Pacific Valley to Highland Lakes road area from Highway 4 to the Carson-Iceberg Wilderness to cross-country OSV use, including Lookout Peak.
2. Manage the North Highway 4 area as presented in Alternative 4, including opening the north ends of Jelmini and Beartrap Basins and the Cabbage Patch/Mattley Ridge area to cross-country OSV use.
3. Open the Bear Valley ski area to cross-country OSV use after the ski season closes.
4. Open the area west of Whittakers Dardanells from Spicer Meadows Reservoir as depicted on Alternative 4.

Thank you once again for allowing me to comment on the draft EIS. Please do not hesitate to contact me if you have any questions regarding my comments.

Sincerely,



Kevin Bradford  
Chico, CA