

**From:** Liz Peterson  
**To:** [FS-comments-pacificsouthwest-stanislaus](#)  
**Subject:** OSV  
**Date:** Monday, October 8, 2018 4:22:00 PM  
**Attachments:** [TCBOS-OSV Comments.pdf](#)

---

Good Afternoon,

Please see the attached comments from the Tuolumne County Board of Supervisors regarding the OSV Use Designation and Draft Environmental Impact Statement.

Thank you

Liz Peterson

Administrative Analyst

Tuolumne County Administrator's Office

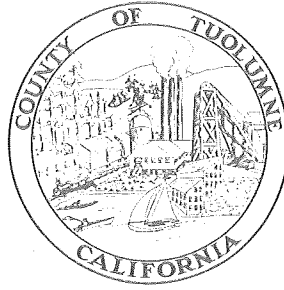
2 South Green St. Sonora, CA 95370

Phone: (209) 533-6396 / Fax: (209) 533-5510

[epeterson@co.tuolumne.ca.us](mailto:epeterson@co.tuolumne.ca.us)

[www.tuolumnecounty.ca.gov](http://www.tuolumnecounty.ca.gov)

Tuolumne County  
Administration Center  
2 South Green Street  
Sonora, California 95370



Alicia L. Jamar, *Chief Deputy*  
Clerk of the Board of Supervisors

Telephone: (209) 533-5521  
Facsimile: (209) 533-6549  
www.tuolumnecounty.ca.gov

## **BOARD OF SUPERVISORS COUNTY OF TUOLUMNE**

Sherrri Brennan, *First District*  
John L. Gray, *Fourth District*

Randy Hanvelt, *Second District*

Evan Royce, *Third District*  
Karl Rodefer, *Fifth District*

*October 8, 2018*

### **Via Website**

Comments-pacificsouthwest-stanislaus@fs.fed.us

Jason Kuiken, Forest Supervisor  
Stanislaus National Forest  
19777 Greenley Rd.  
Sonora, CA 95370

Attn: Over-Snow Vehicle Use Designation

Re: Over-Snow Vehicle Use Designation and Draft Environmental Impact  
Statement (OSV)

Dear Supervisor Kuiken,

The Tuolumne County Board of Supervisors is always appreciative of the opportunity to provide comments and offer input on proposed plans and projects for the Stanislaus National Forest. We are grateful for the opportunity to comment on the Over-Snow Vehicle (OSV) Use Designation Plan and Draft Environmental Impact Statement. Please see the following comments and recommendations:

### **More Acres**

This Board supports Alternative 4 as opposed to the preferred Alternative 5 and we implore the Forest Service to designate even more acres for use by motorized OSV. We believe by designating more acreage and not excluding areas based on potential difficult terrain or concerns about snow accumulation, it will ultimately eliminate detrimental effects to natural resources and reduce conflicts with other recreational users. We believe this to be the safest course of action. Adding acreage may also minimize impacts that could arise from snow compaction, though the science on that issue appears to be vague. We are concerned that Alternative 5 contains less acreage of groomed and non-groomed acres than Alternative 3 or Alternative 4.

### **Increased Education**

The Board is always opposed to increased regulation without a plan to adequately enforce restrictions. We have concerns as to the effectiveness of the Forest Service's current enforcement of illegal OSV use and doubt that any new use designation will result in its desired outcomes. We request the Forest Service add

informational kiosks and better signage that offers OSV users enough information to empower them to comply and feel more personally accountable for using OSV in a safe and responsible manner. We believe the more ownership OSV users have in avoiding conflicts with other users and protecting critical natural resources, the more sustainable your OSV plan will be. Education is the key for that and we would like to see more money invested for this purpose. Make it easier for OSV users to know what you are asking of them.

### **Boundary Lines**

In helping users comply with the OSV Use Designation Plan, it is imperative that boundary designations and useable acres be clearly marked and obvious, not only with signage but also with common sense. As much as possible, considering following natural barriers and topographical contours so it is easy for OSV users to understand where they can and cannot go, especially users who may not be familiar with the area.

### **Avoiding Conflict with Non-Motorized Users**

We propose adding speed limits and limited OSV use within a 2-3 mile buffer around areas such as the Highway 108 Sno-Park in Tuolumne County, which are heavily used by snow-shoers and cross country skiers. Completely excluded OSV use in those areas is impractical; since that area is easily accessible to non-motorized users, it is realistic to have limits placed on OSV users in that area. However, removing the acreage along Highway 108 east of Clark Fork Road due to conflicts with non-motorized users is not reasonable. Snow-shoeing and cross country skiing is nearly impossible in that area, due to lack of access and steep terrain. We propose that portion of acres remain accessible for OSV use.

### **Access for Private Property Owners**

We want to ensure private property owners, especially in the Eagle Meadows area, have access to their property all year long, including access by way of OSV when necessary. As Alternative 5 is currently designated there are some spots in the Eagle Area that would be inaccessible by OSV, potentially cutting off access to private property.

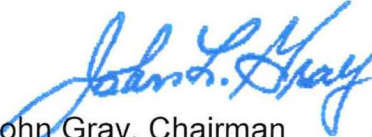
### **Snow Depth vs. Snow Density**

The DEIS notes there is little scientific evidence pointing to snow depth having impacts on species like the Yosemite Toad. And yet, a seemingly arbitrary snow depth of 12 inches has been assigned to the Alternatives. While we are not in favor of intentional actions that knowingly degrade habitat of sensitive species, this Board has been consistently opposed to arbitrary decisions not based on peer reviewed, published scientific evidence. Randomly selecting a snow depth at which species are safe seems to ignore the reality that many of these aquatic species are hibernating during OSV use

season and are not in danger. We believe assigning a snow density is more appropriate for protecting natural resources. We would like to see snow density considered in the Final EIS.

Thank you for your consideration of our comments. We look forward to remaining engaged in this process.

Sincerely,

  
John Gray, Chairman

I hereby certify that according to the provisions of Government Code Section 25103, delivery of this document has been made.

ALICIA L. JAMAR  
Clerk of the Board

By: 