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Organization: Sonora Pass Snowmobile Club

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Comments: My name is Mary Krupka and I am a multiple user of the Stanislaus National Forest. For the past 33 years, I have been camping, fishing, kayaking, hiking and 4-wheeling in the area and for the past 25 years I have been working the Niagara Rim Trail (Eagle Meadows) as an adopt-a-trial worker (4x4 in Motion). 13 years ago, I started snowmobiling and fell in love with the sport! In 2015, the Summit District Rangers Station of the Stanislaus National Forest, asked if we would form a snowmobile club to represent the area riders and in 2016, we officially became the Sonora Pass Snowmobile Club.

When reading the DEIS, I see many references to "damage", "sensitive soils" and other claims that make snowmobiling look destructive to the forest system. Being a forest user of all seasons, I would like to offer what I have observed.

After the snowmobile season, I have never witnessed any destruction or damage to the forest by snowmobiles. Unlike the summer months where you see trash, bullet casings, tire tracks, etc...the snowmobile tracks, which were on top of the snow, have melted away. When I look at pictures of us on top of peaks or "sensitive soil" areas, I see that we are on top of the snow, once again, no damage being done. I think these are very important observations and photographic evidence that should be considered, as I am a year-round forest user (Photos attached). One might say that I am not up there at the right time. I would refute that claim by stating that we "open the trail" (Niagara Rim Trail - part of the Sonora Pass riding area) right after the snow has melted enough for us to travel without doing any resource damage in our 4x4 rigs. The gates are unlocked for only our group to enter and the gates are locked behind us. Once we (4x4 in Motion) and the FS Rangers have completed inspection of the trail system/FS roads (5N01, 5N09, 5N12Y, 5N12YA, 5N87, 6N38Y, 5N04) the report is sent back to the FS Office. When the trail is deemed safe and ready for visitors, the USFS will open the gates for all forest users.

Before I move on, I would like to comment about the Alternative Map #2 provided in the DEIS "Analysis" section. Snowmobilers have been misled with Alternative #2 and have sent in comments concerning an area that the FS says is not available & price areas that we didn't know were closed or were enforced as closed. The FS has gone beyond the scoping of this project by adding closed or wilderness areas to this map. This misstep and confusion should be taken into consideration and possibly reverse and open some of the closed areas that are prime to snowmobile riders.

When speaking of snow depth, I would like the current process to remain in effect. The DEIS proposal of "12" inches does not take into account the variations of snow, terrain, riding on top of pavement, etc...I find it interesting that OHV's/Autos/Motorcycles can ride on top of pavement and dirt roads, but we would be limited to 12" of snow on these same exact roads. There is clearly a bias here and it is one that needs to be avoided. The proposed 12" snow depth is a result of opinion or ideology vs. science and it doesn't take into account the variation of snow characteristics from valley to valley, north/south/east/west facing ranges and other weather anomalies. There is little scientific support for defining a universal, nationwide snow depth for protecting multiple resources, and until there is, we should continue with the process that has been in place for the last many years.

To take the 12 " snow depth issue a tad further, as riders, we self-regulate what we ride on because this will have a direct effect on our snowmobiles. When going through pictures from 2018 and all the way back to 2010, I see my riding group on top of snow, not in the dirt. The pictures have various snowmobile imprints, some look to leave a 1-3 inch impression while others might have a 12 inch impression, none of which are on dirt. I have included these pictures as well as links to video of random people riding the 108/Sonora Pass area. Once again, all on top of snow! No resources being damaged, no hillsides falling or being torn apart. Just snowmobiles on

top of snow. Family fun time, buddy fun time that groups want to take away from us based on misinformation.

This link is a youtube video from March 2012, snowmobiling Sonora Pass. Notice, no damage, tracks on top of the snow.

https://www.youtube.com/watch?v=2Jqk65G-f34

from 2017

https://www.youtube.com/watch?v=4L8dyc5vX6s

Riders on top of snow, no resource damage and hardly anyone out there...