

EXHIBIT A



October 8, 2018

Delivered via email to: comments-pacificsouthwest-stanislaus@fs.fed.us

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

RE: Stanislaus National Forest OSV Designation DEIS Comments

Dear Forest Supervisor Kuiken:

Please accept these comments on the Draft Environmental Impact Statement (DEIS) for the Stanislaus National Forest Over-Snow Vehicle Use Designation Project.

On behalf of the American Council of Snowmobile Associations (ACSA), we would like to take this opportunity to offer these comments. ACSA represents the 19 State Snowmobile Associations across the United States, the 2,200 snowmobile clubs, and the hundreds of thousands of snowmobilers, and we appreciate the opportunity to submit comments in this process.

ACSA was one of the Defendant-Intervenors in the original Snowlands vs US Forest Service case. As the national snowmobile association, we remain committed to a leadership role and continuing presence in the ongoing OSV management of the Stanislaus National Forest. Please consider the following comments/objections.

The OSV Subpart C of the Travel Management Rule affects all National Forest Systems lands where snowfall is adequate for OSV use to be allowed. These objections are submitted in accordance with 36CFR218, Subparts A and B.

We have reviewed the DEIS and Alternative 1 (Proposed Action) and Alternative 5 (Preferred Alternative).

Snow Depth Standards

The final OSV Rule does not set or suggest using minimum snow depths. The U.S. Forest Service should not impose snow depth prescriptions.

Snowfall depth language was considered by the agency and intentionally left out of Subpart C. See 80 Fed.Reg. 4507 (Jan. 28, 2015). The Final Rule included roads, trails and areas for OSV use “shall be designated...where snowfall is adequate for that use to occur, and, if appropriate, shall be designated by class of vehicle and time of year....”

There are many common sense reasons to avoid a snow depth prescription. Weather conditions vary greatly and consequently, snow conditions vary greatly and are constantly changing.

Snow depth is not an effective or necessary means to protect against resource damage. Today’s snowmobiles are expensive and sophisticated and the owners know they are designed to travel over snow, not dirt and rocks. Grooming equipment and operators are also sophisticated in the techniques to enhance the trail conditions. Resource damage is best addressed through officer discretion in the field by applying existing regulations, rather than an inflexible snow depth requirement.

There is not regulatory basis or compelling practical need to create such requirements. The Forest, in cooperation with partners and engaged users can work together to address challenges in a site-specific manner. Snowmobiling is a recreation that has been enjoyed by tens of thousands over the past several decades – in conjunction with the oversight and management of the Forest Service. Continuing to work together, hopefully snowmobilers will be able to enjoy their public lands into the foreseeable future.

Conflict of Uses

The anti-OSV advocates often use the concept of conflict to restrict or eliminate OSV use. Multiple use is the concept that should most often be used. Forest Management currently allows non-motorized access to 100% of the Forest – they are not banned from motorized areas. Motorized areas are not motorized only -- they are open to all users.

Conflict should not be treated as an inherent incompatibility among different trail activities, but rather as goal interference attributed to another’s behavior. There will always be users that are not happy and will find some reason to complain. Efforts to minimize the number of contacts in problem areas should be made. Each contact among trail users has the potential to result in conflict. Contact is most often made in the parking areas and congested areas. Creation of separate trail heads and parking areas should be considered.

Pacific Crest Trail Crossings

The Pacific Crest Trail is a non-motorized trail that runs through the western U.S. and Sierra Nevada Mountains in California. In the Stanislaus, it appears to be very remote and not accessible during the winter.

Again, on behalf of ACSA and the thousands of snowmobilers who enjoy snowmobiling and plan in the future to continue to enjoy over snow vehicle access to the Stanislaus National Forest, we appreciate the opportunity to submit these comments/objections in this process. We hope they will be seriously considered as this process moves forward. If you have any questions, please contact us.

Sincerely,

Christine Jourdain
Executive Director