October 7, 2018

Stanislaus National Forest Supervisor's Office
19777 Greenley Road
Sonora, CA 95370

To whom it may concern,

Share the Slate is an organization that strives to preserve access to the winter trailheads and drainages for ALL users in the Crested Butte / Gunnison area of Colorado. We believe that through education and awareness that all users can continue to happily coexist on our winter trails without restricting access to specific user groups on our public lands.

We are concerned about the direction that the USFS is taking in the Stanislaus National Forest. The preferred alternative does a poor job of honoring previous motorized use, and unfairly target motorized use for sweeping closures. We suggest taking a longer look at current usage and adding wintertime special management areas that include snowmobiling in areas such as Eagle Meadows and Pacific Valley. Snowmobiles don't require roads or trails and have no effect on the permanent landscape.

Closing vast swaths of public lands to one specific user group (over-snow vehicles) has many unintended negative consequences. For one, motorized users will be packed into dense areas where snowmobiling is allowed. This will create dangerous conditions for collisions between riders. This will also create hardships for other user groups- rather than the occasional motorized user passing by, the few areas open to snowmobiling will be too busy for other groups to enjoy. We suggest a multi-use approach that allows users to spread out and greatly reduces user conflicts.

Great non-motorized areas already exist close to parking areas. Carson-Iceberg Wilderness sits only a mile away from the Lake Alpine Snopark parking lot. The meadow across the street from the town of Bear Valley offers great non-motorized recreation in a tame environment. Both Mokelumne and Carson-Iceberg Wilderness areas are accessible within only a few miles from multiple parking areas. Areas that are farther from trailheads are better accessed using motorized methods. Keep most of these hard-to-reach areas open so we can enjoy them!

Another area of concern is the "minimum snow depths" as currently suggested. Snow is a diverse medium- one foot of fluffy snow may not support a snowmobile whereas two inches of snow with a solidly frozen rain or sun crust may be more than enough. We suggest the following definition be used in lieu of a hard number: "Adequate snow cover is defined by a layer of dense, packed snow, or deeper fresh snow sufficient to support your vehicle, and prevent damage to forest resources."

The preferred alternative maps are confusing as currently drawn. Boundaries should follow easily identified topographic features such as creek beds and ridges. This will ensure that users know where they can and cannot go without having to constantly check a GPS to stay within boundaries.

Finally, there should be no closing date on Sonora Pass for a number of reasons. First, this area is one of the few high-elevation trailheads available during the spring season. It must remain open to all users to ensure a long season. Second, many users may wish to snowmobile to other areas before parking their vehicles and skinning or climbing to springtime ski mountaineering objectives. A snowmobile closure eliminates this option to enjoy our public lands. Finally, our changing climate requires consideration. As snow levels in the Sierra continue to rise, higher elevation areas may be one of the few choices available. Arbitrarily closing Sonora Pass based on an April 15 closure date may serve to close an area that may not be available all season long due to low snowfall seasons.

Thank you for your time and consideration, and we look forward to seeing changes to the preferred alternative which respects all user groups and a multi-use approach to forest management.

Frank Konsella
Secretary/Treasurer, Share the Slate