



Promoting opportunities for quality, human-powered winter recreation and protecting winter wildlands

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Micki D. Smith  
Amador Resource and Recreation Staff Officer  
Eldorado National Forest  
100 Forni Road  
Placerville, CA 95667

Re: Scoping Notice and Proposed Action: Eldorado National Forest Over-Snow Vehicle Use Designation – March 2015

Ms. Smith:

In this letter we provide the Alternative developed by Snowlands Network and Winter Wildlands Alliance pursuant to the Settlement Agreement referenced in the Scoping Notice and Proposed Action. We request that this Alternative be analyzed as part of the Environmental Impact Statement for the designation of over-snow vehicle use on the Eldorado National Forest (“ENF”).

The ENF does not publish a forest-wide winter recreation guide or map that identifies areas that are closed to motorized use in winter. The current winter motorized closures to motorized use in winter are determined by the 1988 Land and Resource Management Plan (“LRMP”); 1976 Off Road Vehicle and Travel Plan Map; the 1982, 1984, 1988, 1991, 1993, 1996, 1998 and 2000 Fire Restriction, Vehicle Travel and Firewood Cutting Plan Map (“Triple Threat Map”); the 1998 Guide to Silver Bear Snowmobile Trails; and Forest Orders. These are not consistent. Moreover, ENF has allowed many Forest Orders that enforce non-motorized winter designations to lapse. While this lapse may eliminate the ability of the ENF to enforce the non-motorized designations, it does not detract from the fact that lawful planning processes designated areas to be managed non-motorized in winter.

Based on our review of the foregoing, the Proposed Action fails to show the true state of areas that the ENF has previously designated to be managed as non-motorized in winter. There are good reasons for continuing or renewing all prior non-motorized designations. All prior non-motorized designations should be carried forward and made effective and, in general, are included in our Alternative.

The significance of this is shown by example: The road to Woods Lake and its surrounding lands, and the route to the Meiss drainage from Carson Pass, both would be open to OSV use under the Proposed Action in complete disregard for the fact that these areas are universally regarded and enjoyed as non-motorized terrain, and opening them to motorized recreation would substantially adversely affect current usage in these areas.

Winter travel planning must protect opportunities for non-motorized recreation, recognizing the experience non-motorized users seek, and must minimize impacts from OSVs on wildlife, the environment, and other uses. Our Alternative is designed to minimize these impacts, particularly to non-motorized recreation, while continuing to allow high quality OSV recreation on the ENF. Where our Alternative closes additional lands, we have drawn the boundaries of these closed areas so as to not detract from reasonable OSV use. For the most part these closures codify recent patterns of land use.

Additional closures and other restrictions may be appropriate and necessary to protect species, watersheds, riparian areas and other ecosystems. We look forward to seeing a full analysis of OSV impacts on wildlife, the environment and other existing or proposed recreational uses in the Draft EIS.

Our Alternative allows unrestricted cross-country snowmobile travel to continue on a substantial portion of ENF lands. It is a win-win for users and the local communities, because it will better position the ENF to accommodate growth in winter recreation demand as well as climate change trends that limit and concentrate over-snow recreation opportunity. Thus the ENF will serve the most users and bring the most winter tourism to local communities in a sustainable manner.

Our Alternative meets the Purpose and Need set forth in the Eldorado's Notice of Intent and is in compliance with Executive Order 11644, the Over-Snow Vehicle Rule (36 CFR 212.80-.81), and the Settlement Agreement between the Forest Service and our organizations. However, we believe the Purpose and Need statement should specifically mention the need to preserve accessible opportunities for users to recreate on the national forest in winter free from the noise and other impacts of motorized recreation, rather than just ambiguously refer to "conflicts" between uses. Specifically, we propose that the Purpose and Need for this planning process be amended as follows (addition in bold italics):

#### **Purpose and Need for Action**

One purpose of this project is to effectively manage OSV use on the Eldorado National Forest to provide access, ensure that OSV use occurs when there is adequate snow, promote the safety of all users, ***ensure non-motorized recreation opportunities are preserved and enhanced***, enhance public enjoyment, minimize impacts to natural and cultural resources, and minimize conflicts among the various uses.

Overall, our Alternative provides that 72% of the ENF could potentially be open to OSV travel, including cross-country travel, pending closer review of environmental impacts and other considerations. The OSV use areas outlined in our Alternative constitute approximately 20% of the ENF.

Our Alternative creates a fair balance of quality winter recreational opportunity on the ENF, taking into account the relative demand for motorized and non-motorized recreation, the impacts of motorized recreation on non-motorized users and the environment, and the relative ability of the landscape to sustain growth in motorized use as compared to its ability to sustain growth in non-motorized use.

In many areas, the primary objective of the Forest Service and the primary needs of the public have shifted from resource extraction to recreation. Situated within a several-hour drive of dense centers of population, this trend is very true for the ENF. The demands of an increasing population require the ENF to reevaluate how to serve the public in a responsible and sustainable manner.

As recently stated by the National Forest Foundation, “Backcountry skiing and snowboarding are some of the fastest growing sectors of the ski industry. Recent advances in snowmobile technology allow riders to get farther into the backcountry than ever before.”<sup>1</sup> As recently confirmed by the Forest Service, “We can no longer manage as we have in the past.”<sup>2</sup>

Our Alternative recognizes and deals with these facts and the twin facts that (i) there is substantially greater demand for non-motorized winter recreation on the ENF than for motorized recreation, as established by Forest Service monitoring data (NVUM)<sup>3</sup> and direct observation, and (ii) on any single parcel, the ENF can accommodate far more non-motorized users than motorized users.

One method for creating a fair balance of winter recreational opportunity that serves the greatest number of users and allows for the most growth in sustainable recreation is to restrict OSV travel to designated routes. Our alternative uses this method in two places — (1) the road<sup>4</sup> from the west-most dam on Loon Lake to where it exits the Loon Lake Winter Recreation Area, and (2) a short stretch of road within the Van Vleck Bunkhouse non-motorized area that is designated as an OSV route in order to provide motorized access to the facility.

In our Alternative certain snowmobile trails form the boundary of non-motorized areas, for example the Strawberry snowmobile trail from 42 Mile Picnic Area and the Silver Bear Snowmobile Trail, but these are not considered designated routes because the forest is open to cross-country travel on one side of each of these routes.

Forest Service planning regulations recognize sustainable recreation as an important objective for the Forest Service.<sup>5</sup> The need to close areas to OSV use, and impose lesser restrictions in some areas such as prohibition of cross-country travel, in order to protect non-motorized recreation opportunity is discussed in general in our position paper, “Analyzing OSV Impacts to Other Winter Recreation Users,” included in our submission as Exhibit A (“Analyzing Impacts”).

The OSV restrictions in our Alternative will also provide enhanced protection to species, habitat, and water quality by increasing the acreage on the ENF that is closed to cross-country OSV travel. We outline wildlife and environmental protections that should

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<sup>1</sup> “Voices from the Forest,” Your National Forests, the Magazine of the National Forest Foundation, Winter-Spring 2015.

<sup>2</sup> “A Framework for Sustainable Recreation,” USFS, USDA June 25, 2010.

<sup>3</sup> According to the most recent National Visitor Use Monitoring data (2012), ENF receives more than five times more cross-country skier visits (19,069) than snowmobiler visits (3,641). Backcountry skiing is generally included in the cross-country skiing category for NVUM surveys.

<sup>4</sup> This road is under the management jurisdiction of El Dorado County and constitutes a designated route through the Forest Service managed lands.

<sup>5</sup> 36 CFR 219.8(b)(2).

complement our proposed non-motorized recreation closures in our position paper, “Wildlife and Environmental Concerns -- Over-Snow-Vehicles in the Eldorado National Forest” included in our submission as Exhibit B (“Wildlife Concerns”). We also support the comments submitted by The Wilderness Society on fauna and flora.

General principles for effective management of OSVs and the need for such practices (both for preservation of recreational opportunity and for protection of plants, wildlife, and the environment) are discussed in the Winter Wildlands Alliance publication “Snowmobile Best Management Practices for Forest Service Travel Planning” included in our submission as Exhibit C (“BMP Practices”).

We have also included in our submission, via CD, a file of important literature and science studies that document OSV impacts and the need for restrictions on OSV use. A list of these documents is included as “List of Additional Submitted Documents,” attached as Exhibit D. These are basic to any analysis of OSV impacts.

We refer you to these documents for general support for each element of our Alternative. As discussed throughout these documents, the restrictions outlined in our Alternative are necessary to manage OSVs in accordance with the minimization criteria set forth in Executive Order 11644 (Executive Order No. 11644, 37 Fed. Reg. 2877, Feb. 8, 1972, *as amended by* Executive Order No. 11989, 42 Fed. Reg. 26959, May 24, 1977) and in accordance with Forest Service principles of Sustainability, Multiple Use and Diversity of Plant and Animal Communities (Multiple-Use Sustained-Yield Act of 1960).

We have included in our submission a map entitled “Winter Recreation Management on the Eldorado National Forest”, attached as Exhibit E. This map displays the specific areas that we have identified as of importance for non-motorized recreation and areas that are closed to winter motorized use under the ENF LRMP or other existing management decisions. Our Alternative proposes that OSV travel not be permitted in these areas.

Our map also identifies suggested boundaries of areas that should be designated as open to OSV's. In designating these areas we have recognized that low-elevation areas on ENF are not suited to any over snow recreation. ENF's proposed designation of open areas must also take into account sensitive environmental areas, wildlife areas, areas of historical and tribal significance, and other appropriate considerations that we are able to only generally reference in our presentation.

Access to lands suitable for over snow recreation is limited in many areas of the ENF. Although access improvements may be outside the scope of this travel planning process, plowing additional parking areas, especially existing summer trailheads, for skiers and snowshoers to access non-motorized areas, would go a long way towards providing quality winter recreation opportunities and access on the ENF. We have suggested some areas where improved access is important.

Our Alternative emphasizes land use designations that are in keeping with historical use, maximizes lands for a given type of recreation where the access is the best for that type of recreation, and, although outside the scope of this planning process, suggests locations for improved access.

In the remainder of this letter, we will discuss (A) the 2015 Over-Snow Vehicle Rule, (B) OSV route grooming and trailhead plowing, (C) the need to mitigate impacts from OSV use, (D) new management areas to protect opportunities for non-motorized recreation, (E) the suggested boundaries of areas to be designated as open to OSV use, and (F) best management practices for OSVs to be required across the ENF.

#### A. The 2015 Over-Snow Vehicle Rule

In January 2015, the Forest Service released a new Over-Snow Vehicle Rule providing a framework for winter travel planning efforts on all National Forest lands (80 Fed. Reg. 4500, Jan. 28, 2015, 36 C.F.R. part 212, subpart C). The OSV Rule requires that forests designate routes and areas where OSV use is allowed, publish these designations on an OSV use map, and prohibit any OSV activity that is inconsistent with the published map. This travel planning is to occur under the directives that accompanied the 2005 Travel Management Rule, although we anticipate that these directives will be amended in light of the new OSV Rule.

The OSV Rule requires national forests with adequate snowfall to designate and display on an “over-snow vehicle use map” specific areas and routes where OSV use is permitted based on resource protection needs and other recreational uses. The ENF is the third national forest to undergo winter travel management planning under the new OSV rule. To comply with the rule and get rule implementation off to a good start it is critical that the ENF’s OSV plan satisfies the Forest Service’s substantive legal duty to locate areas and trails designated as open to OSV use to minimize resource damage and conflicts with other uses.

The ENF is obligated to comply with the minimization criteria outlined in Executive Order No. 11644, 37 Fed. Reg. 2877 (Feb. 8, 1972), *as amended* by Executive Order No. 11989, 42 Fed. Reg. 26959 (May 24, 1977). These criteria are as follows: 1) minimize damage to soil, watershed, vegetation, or other resources of the public lands; 2) minimize harassment of wildlife or significant disruption of wildlife habitats; and 3) minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands. The executive orders require the Forest Service to *minimize* impacts — not just identify or consider them — when designating areas or trails for OSV use, and to demonstrate in the administrative record how it did so. Therefore, the Forest Service must show not just that impacts have been studied, but specifically demonstrate how effective each of the Alternatives presented in the DEIS is in minimizing impacts from OSVs. As one of the first forests to implement the new OSV rule, it is critical that the ENF properly apply the minimization criteria.

To meet these minimization criteria the ENF must follow the process for travel management planning as outlined in Chapter 10.3 of Forest Service Handbook 7709.55. This six-step process includes: “(1) compiling existing travel management direction; (2) assembling resource and social data; (3) using travel analysis to identify proposals for change; (4) conducting appropriate environmental analysis and decision-making; (5) identifying designated routes and areas on an MVUM [or OSVUM in this case]; and (6) implementing, monitoring, and revising.” Step 3, travel analysis, is the critical point where broad-scale issues are identified and thus forms the basis for proposed actions related to travel planning. We believe that the ENF should not have proposed travel

management designations in its scoping notice without having completed this travel analysis. We ask that the ENF comply with all 6 steps in the travel planning directives.

Under the OSV Rule, areas open for cross-country snowmobile travel must be smaller than a ranger district, and areas that are not specifically designated as open are closed to OSV use. The proposed action put forth by the ENF does not abide by the letter or spirit of this rule. The proposed action fails to designate areas that are “discrete,” “specifically delineated,” and “smaller . . . than a ranger district.” (definition of an “area” in 36 C.F.R. § 212.1). Rather than identify and delineate discrete open areas that are smaller than the forest’s ranger districts, the scoping notice suggested that the ENF proposes to designate as open everywhere that is not designated closed. Moreover, proper application of the executive order “minimization criteria” almost certainly would not result in designation of open areas even close to the size of a ranger district given the significant adverse impacts of cross-country OSV travel to sensitive wildlife, non-motorized users, and other uses and resources.

We hope that the Preferred Alternative identified in the draft Environmental Impact Statement draws heavily from our proposal.

#### B. OSV Route Grooming and Trailhead Plowing

As required under the Settlement Agreement, the ENF is required to “identify snow trails for grooming” and analyze “a range of alternative actions that would result in varying levels of snowmobile use,” taking into account the impact of activities “such as the plowing of related parking lots and trailheads”. Amended Settlement Agreement, *Snowlands Network v. U.S. Forest Serv.*, 2012 WL 4755161 (2012) (No. 2:11-cv-002921).

A major consequence of OSV route grooming and trailhead plowing is to increase the general level of OSV traffic and usage in the national forest. In its environmental analysis of the OSV grooming program, the State assumed that the program approximately triples snowmobile activity in the groomed areas. (DEIR p 2-20) The manner in which such use affects and displaces non-motorized use and impacts wildlife is discussed in our position papers that are included with this comment letter (see “Analyzing Impacts,” “Wildlife Concerns,” “BMP Practices” and Exhibit D).

Our Alternative does not call for the cessation of grooming on any currently groomed OSV route or for the cessation of plowing of any OSV trailhead. With restrictions on OSV use in other areas, there is adequate room on the ENF to provide a fair balance of recreational opportunity without ending the grooming of OSV routes and plowing of OSV trailheads. The additional closures and restrictions we propose in our Alternative serve as mitigation of the consequences of grooming OSV routes and plowing OSV trailheads by establishing non-motorized areas where recreation users seeking clean and quiet areas can readily avoid the impact of the State’s OSV grooming program.

Restrictions and other mitigation measures may be necessary beyond those provided by our suggested Alternative to protect species, watersheds, riparian areas and other ecosystems. Appropriate mitigation measures for various impacts of OSVs on other forest uses, wildlife, and the environment should be spelled out in the Draft EIS. With the minimization criteria in mind, we expect that designated OSV use areas set forth in the

Preferred Alternative will be smaller than the entirety of those lands that lie outside of our Important Non-motorized Recreation Areas. We have included on our map suggested boundaries for designation of OSV areas, subject to further review of sensitive environmental areas, wildlife areas, areas of historical and tribal significance, and other appropriate considerations that we are able to only generally reference in our presentation.

#### C. The Need to Mitigate Impacts from OSV Use

In proposing this Alternative, we assume that the Forest Service acknowledges the need for mitigation of OSV impacts due to the noise, emissions and other impacts of OSVs that are discussed in our submitted and referenced documents, as well as the stimulation of OSV use caused by the Forest Service's participation in the State of California's OSV trail grooming program. The ENF should, to the extent practicable, rely on relevant past scientific studies of OSV impacts such as noise, pollution, and user experiences so that it does not duplicate efforts in this EIS. We believe these impacts have been well-established in prior government studies, including, for instance, in Yellowstone National Park, as well as the numerous scientific studies referenced in our submitted documents. Certain impacts — such as noise and the smell of toxic exhaust — are obvious from personal observation, and their impact on other users is subjective and well-established by user comments (see, for instance, the file of comments included in Exhibit D).

In order to manage OSVs in a manner that meets the minimization criteria, the Forest Service must collect reliable data on OSV impacts. Regardless of the Alternative selected for the final plan, we suggest, among other analyses, that the Forest Service measure the ambient air pollution in recreation areas with heavy snowmobile traffic (both trailheads and routes), the distance snowmobile noise travels through popular recreation areas, and the relative capacity of powder-covered slopes to serve motorized and non-motorized users (by measuring the relative number of users that can obtain their desired recreation experience on one slope [a] if it is open to motorized travel and [b] if it is closed to motorized travel). This data can help determine the impact of motorized use on users desiring clean and quiet recreation, and uses established Forest Service indicators such as PAOT (persons-at-one-time) and RVD (recreation visitor days).

#### D. Management Areas

The map submitted with our Alternative identifies the areas that are important for non-motorized recreation. The map also identifies those areas that are designated as non-motorized in the ENF LRMP. The LRMP states that ENF will manage designated Wilderness, proposed Wilderness, and Semi-Primitive Non-motorized ("SPNM") areas as non-motorized year-round. Many of these areas are also important for non-motorized winter recreation, and we fully support adhering to the LRMP and managing these areas non-motorized year-round.

We understand that the ENF's winter travel management plan will designate areas for motorized use, rather than areas that are specifically managed for non-motorized use. However, our expertise and knowledge is of the areas on the ENF that are valuable for non-motorized recreation. Therefore, we have focused our efforts on identifying these areas. We are separately submitting a GIS shapefile of these areas in order to facilitate analysis of this Alternative during the EIS process.

The three different types of human-powered winter recreation discussed in our document “Analyzing Impacts” have different objectives. Therefore, we have classified our proposed areas into three types:

“Front-country non-motorized” areas protect non-motorized recreation opportunity in areas that are easily accessed from plowed trailheads and roads and have a high degree of non-motorized use. Restriction of OSVs is necessary to eliminate or reduce noise, toxic exhaust, disproportionate consumption of powder snow, trail rutting, and other OSV impacts.

“Backcountry solitude” areas protect large areas for a quiet and remote recreation experience in winter. These areas also protect sensitive species that thrive only in relatively large areas with minimal human activity.

“Managed shared use” areas restrict OSV usage so that there can be meaningful shared use of easily-accessible and popular areas. Meaningful shared use is made possible by restricting OSVs to designated routes, establishing separate trailheads, restricting OSVs to cleaner and quieter machines, imposing speed limits on shared-use trails, and other management tools. Methods for managing shared use are explained and discussed in the documents “Analyzing Impacts” and “BMP Practices”.

### **Ludlow Hut**

Classification: Backcountry solitude

Size: 1,214 acres

This non-motorized area will provide visitors to Ludlow Hut a quality winter experience.

### **Loon Lake Winter Recreation Area, Van Vleck Closure, and Van Vleck Bunkhouse**

Classification: Managed shared use (Loon Lake Winter Recreation Area and Van Vleck Bunkhouse) and backcountry solitude (Van Vleck Closure)

Size: 8,574 acres<sup>6</sup>

These three areas have been managed as non-motorized in winter. If they are not currently managed as non-motorized in winter it is because the ENF has allowed applicable documents to lapse (there is no doubt about the prior designation). The areas include approximately 20 miles of trails marked and patrolled by the El Dorado Nordic Ski Patrol for the use and enjoyment of skiers and snowshoers.

The Loon Lake Winter Recreation Area and the Van Vleck Bunkhouse each include a designated OSV (or OHV) route through it, which has impacts to the non-motorized users in the area, and thus these areas are designated as managed shared use. A road<sup>7</sup> from the west-most dam on Loon Lake to where it exits the Loon Lake Winter Recreation Area is

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<sup>6</sup> 2,950 acres for Loon Lake Winter Recreation Area (excluding lake that is never stable for travel), 5,159 acres for Van Vleck Closure and 465 acres for Van Vleck Bunkhouse.

<sup>7</sup> This road is under the management jurisdiction of El Dorado County and constitutes a designated route through the Forest Service managed lands.

designated for OSV (or OHV) use, and a short stretch of road within the Van Vleck Bunkhouse non-motorized area is designated as an OSV route in order to provide motorized access to the facility. Due to the managed shared use, the Forest Service should ask users to respect a voluntary restriction of use to BAT-compliant OSVs and commit to review such restriction every five years to determine whether it should be made mandatory.

The 2000 “Triple Threat Map” shows the Van Vleck Closure and Bunkhouse areas managed contiguously with the SPNM area to the east. The designation stipulates that no motorized travel is permitted.

These three areas are very popular with skiers engaging in the backcountry exploring type of activity and the area is unique in that the Loon Lake Chalet and Van Vleck Bunkhouse provide overnight accommodations for the area. The Loon Lake Chalet accommodates 20 overnight visitors, is usually rented on weekends and holidays plus some mid-week times, and is open during the day to the general public on weekends. The Van Vleck Bunkhouse accommodates 6 overnight visitors and has a very high occupancy rate.

### **Barrett Lake Road**

Classification: Backcountry solitude  
Size: 214 acres

This small area threads between two SPNM areas and ends at the boundary to Desolation Wilderness. It connects two SPNM areas that are non-motorized.

### **Nordic ski areas north of Highway 50**

Classification: Front-country non-motorized  
Size: 381 acres

The two existing Nordic ski areas north of Highway 50 are currently managed for non-motorized recreation. They are accessed directly from the Echo Lakes Sno-Park or from the nearby road that leads to Echo Lakes. These areas have historical significance for non-motorized winter recreation and the 149-acre parcel adjacent to the Sno-Park contains marked ski and snowshoe trails. These areas should continue to be managed for non-motorized use.

### **Nordic ski area south of Highway 50**

Classification: Front-country non-motorized  
Size: 232 acres

This area, which includes Lake Audrain, was historically accessed from the Echo Summit Sno-Park. With the conversion of that Sno-Park to the commercial Adventure Mountain operation, the main access is from the Echo Lakes Sno-Park. We believe that a parking area on the south side of Highway 50 should be available to skiers and snowshoers wishing to explore the backcountry south of Echo Summit, without payment of a large facility use charge. This is one of the most important winter access issues on the ENF.

We understand such discussion may be outside the scope of this travel management process, but the historical importance of this area to backcountry non-motorized users needs to be appreciated in this winter travel planning process. This area is currently managed for non-motorized recreation.

### **Highway 50 South**

Classification: Backcountry solitude

Size: 4,016 acres

This area knits together the Echo Summit Nordic Area South and the nearby SPNM area to form a contiguous area accessible to backcountry skiers and snowshoers. The road to the microwave towers provides historical access to the ridgetop and farther south including Bryan Meadow. It is also part of the classic Echo-Carson Pass tour and historically has been very popular with non-motorized users engaging the backcountry exploring type of activity.

The Sayles Canyon area can be accessed from Highway 50 at the Sayles Canyon Tract, 0.4 mile east of Camp Sacramento. The little parking available here is typically used by the residents of the Tract.

The last part of this area is the part to the south of the SPNM area. This area can be approached by snowmobiles staging at the 42 Mile Picnic Area and traveling along the Strawberry snowmobile trail, but the snowmobile trail does not enter the closure area and therefore the closure does not impact motorized use of the trail.

The Sierra Crest part of the Highway 50 South area is also part of a citizen proposed wilderness stretching from Highway 50 down to Highway 88, cherished for its wilderness values, as further described in the comments of The Wilderness Society.

### **Carson Pass Corridor North**

Classification: Front-country non-motorized

Size: 3,943 acres

The Carson Pass Corridor North area has a long historical significance to backcountry non-motorized winter travel.

The southernmost part of this area, which lies between Highway 88 and the ridge to the immediate north, was managed as non-motorized until the Forest Order lapsed and was not subsequently reviewed or renewed by the ENF. Both the Meiss and Carson Pass Snow-Parks prohibit snowmobile staging, which confirms the intent and current practice that this area be limited to non-motorized recreation. This is also the gateway to the popular ski and snowshoe area of the Meiss drainage and beyond.

The part of this area that lies on the ridge to the southeast of Little Round Top includes only one side of the ridgetop; the other side of the ridgetop is part of a non-motorized area on the LTBMU. The ridgetop is notorious for its windswept conditions and for much of the winter season the soft volcanic rock surface is exposed on much of the ridgetop, and when snow is present it is most likely not adequate for snowmobiles to travel without

scaring the underlying ground. Allowing snowmobiles on the ENF half of the ridge would facilitate trespass onto the closed part of the ridge and would undoubtedly result in damage to the environment.

The part of this area that lies to the north of Little Round Top is accessed by skiers and snowshoers who chose to traverse the ridgetop or circumnavigate the ridge via Meiss Meadow and Showers Lake. This is a highly popular non-motorized backcountry touring area that has at times been served by the Meiss backcountry hut, and the area still sees substantial use in winter.

The final part of the Carson Pass Corridor North is the area that lies to the north of Highway 88 between Kirkwood Nordic and Martin Meadow. This area is less than one square mile and surrounded by the Caples Creek Proposed Wilderness, where motorized use is prohibited; it is too small to effectively support motorized winter recreation.

The Sierra Crest part of the Carson Pass Corridor North area is also part of a citizen proposed wilderness stretching from Highway 50 down to Highway 88, cherished for its wilderness values, as further described in the comments of The Wilderness Society.

### **Carson Pass Corridor South**

Classification: Front-country non-motorized  
Size: 4,537 acres

The Carson Pass Corridor South was managed as non-motorized until the Forest Order lapsed and was not subsequently reviewed or renewed by the ENF. Both the Meiss and Carson Pass Sno-Parks prohibit snowmobile staging, which confirms the intent and current practice that this area be limited to non-motorized recreation.

The area contains two very important ski and snowshoe destinations: Woods Lake and the Mokelumne Wilderness to the south of the area. Woods Lake is an exceptionally popular tour on a snow-covered road. Winnemucca Lake and beyond, all within the Mokelumne Wilderness, is accessed from Carson Pass through this area and is a very popular destination for skiers and snowshoers. Some visitors combine the two by making a loop first to Winnemucca Lake and then to Woods Lake before returning to the highway. Approximately 3 miles of marked ski and snowshoe trails lie within this area. In addition, on a busy weekend dozens of skiers traverse this area to access alpine slopes on Elephant's Back and the shoulders and chutes of Round Top. This area has become one of the most heavily used places in California for backcountry skiing.

The third part of the Carson Pass Corridor South area is on the south side of Highway 88 near Martin Meadow. This area has limited staging. This area draws skiers of all abilities because it can be combined with visiting Castle Point on the north side of the highway and contains some of the best, easily accessible, powder snow along the Highway 88 corridor.

## **Anderson Ridge**

Classification: Front-country non-motorized  
Size: 1,953 acres

The Anderson Ridge area contains approximately 13 miles of marked ski and snowshoe trails. This trail system was developed by volunteers with the permission of the Forest Service.

Currently no quality access exists along Highway 88 for snow play. A landing area, 0.2 mile from Highway 88 at Foster Meadow Road, has the potential to be an excellent Sno-Park and could serve snow play on the adjacent slopes as well as being the trailhead for the Nordic trail system in the Anderson Ridge area. Thus the Anderson Ridge non-motorized area can serve two distinct communities: backcountry traveler and snow play.

The local snowmobile club had in the past agreed to foster this area for non-motorized winter recreation, and the ENF posted signs at two locations asking snowmobilers not to enter the area; unfortunately compliance with the voluntary closure was not good.

In several locations the trail system shares the snow-covered roads with the Silver Bear Snowmobile Trail, but the non-motorized area does not include any of these roads. Due to this proximity of the motorized and non-motorized trail systems, it is important that the non-motorized area be delineated specifically and accurately. To that end it is important that the western boundary of the non-motorized area be located on the eastern side of the Silver Bear Snowmobile Trail from where the Trail is closest to Highway 88 approximately 0.5 mile west of Foster Meadow Road until the boundary of the non-motorized area leaves the Silver Bear Snowmobile Trail at Forest Road 9N14d.

## **Pacific Crest Trail**

The Pacific Crest Trail should be managed to provide a non-motorized winter experience for users. Snowmobiling must not be allowed on or along any section of the PCT, as stated in the "Comprehensive Management Plan for the Pacific Crest National Scenic Trail" (USDA Forest Service, January 18, 1982). As further set forth in that document, "any motorized use of adjacent land should be zoned to mitigate the noise of conflict."

The PCT traverses the eastern edge of ENF and falls mostly within designated Wilderness, other existing non-motorized closures, or our proposed additional non-motorized closures. If our proposed closures are adopted, there would be no need for OSV crossing points along the PCT in these areas.

The PCT runs for 5.2 miles through the popular OSV area near Blue Lakes south of Forestdale Divide. Between Forestdale Divide and Lost Lakes the PCT is on or near road 9N01 for a distance of about 1.5 miles. The PCT should be marked or signed where it leaves the vicinity of the road to prevent OSVs from traveling on the PCT between Lost Lakes and the point where the PCT leaves the ENF and enters Toiyabe NF going south.

In order to reduce impacts on this congressionally designated National Scenic Trail, the underlying policy with respect to OSV crossings of the PCT deemed necessary to provide access to motorized lands should be to establish limited OSV crossing zones. These

crossings should be marked on winter travel maps and utilize already established roads and routes. The number of crossing points should be sufficient to allow access by OSVs to lands on both sides of the PCT, but small enough that the OSV community will respect the non-motorized nature of the PCT. The PCT, non-motorized lands around it, and designated crossing points should be clearly marked on the ENF winter recreation guides. In addition, to reduce OSV trespass from those small sections where the PCT follows a road and is co-designated as an OSV route, we suggest that the ENF clearly sign where the non-motorized trail resumes.

### **Snow Play Areas**

In addition to the above, the ENF should designate non-motorized areas that provide suitable access and lands for snow play. Snow play areas allow for concentration of use in areas that are appropriate for snow play and that have adequate parking. Such areas and their primary access routes should be closed to OSV traffic for safety and other reasons.

We suggest the ENF consider development of a snow play area near the junction of Foster Meadow Road and Highway 88. A short distance from the highway there exists a landing that would be an excellent location for a parking area. It would serve snow play on the adjacent slopes as well as serve as a trailhead for the Nordic trail system in the Anderson Ridge area.

### **E. Suggested Boundaries for Designated OSV Areas**

We have included on our map suggested boundaries of the areas that the ENF might designate as open to OSV use. Such boundaries encompass all currently designated OSV routes and most of the popular off-trail OSV riding areas.

There are additional lands, not marked on our map, that provide significant OSV recreation opportunity and will continue to be open to OSV use as permitted by the landowner. We have not marked such areas because the Forest Service does not manage them. Although much of these lands are generally open to OSV use, where the landowner wishes to exclude motorized use of his land, such desire must be respected. The ENF winter recreation guides must alert OSV riders of the need to respect private landholdings.

The following is a summary of motorized areas that we feel are of significant value to the OSV community.

### **Loon Lake OSV Use Area**

Size: 10,587 acres

This area lies to the north of Loon Lake and is accessed via the county road that begins at the western dam on Loon Lake. This area connects with motorized lands on the LTBMU and can be accessed from that forest as well.

Due to its proximity to popular areas where non-motorized users seek backcountry solitude, our Alternative requires the ENF to ask users to respect a voluntary restriction

of use to BAT-compliant OSVs and commit to review such restriction every five years to determine whether it should be made mandatory.

#### **Van Vleck Motorized Area**

Size: 9,626 acres

This area borders the Loon Lake Winter Recreation Area and the Van Vleck Closure and Bunkhouse areas. It includes access to the designated route to the Van Vleck Bunkhouse.

Due to its proximity to popular areas where non-motorized users seek backcountry solitude, our Alternative requires the ENF to ask users to respect a voluntary restriction of use to BAT-compliant OSVs and commit to review such restriction every five years to determine whether it should be made mandatory.

#### **Robbs Peak OSV Use Area**

Size: 2,282 acres

This area contains roads around and to Robbs Peak, where a winter hut is maintained and is open to motorized visitors.

#### **Wrights Lake OSV Use Area**

Size: 17,351 acres

This area contains extensive backcountry riding.

#### **Highway 50 to Highway 88 OSV Use Area**

Size: 24,972 acres

Snowmobilers stage at 42 Mile Picnic Area and ride the snowmobile trails and excellent cross-country terrain in the area. It is possible to ride the Strawberry trail almost to Highway 88.

#### **Silver Bear North OSV Use Area**

Size: 35,333 acres

This area is accessed from the Iron Mountain Sno-Park and contains a portion of the Silver Bear Snowmobile Trail and Leek Spring Lookout in particular. A very extensive system of Forest Service roads extends north from the Silver Bear Snowmobile Trail with excellent riding in places such as Baltic Ridge.

#### **Silver Bear South OSV Use Area**

Size: 20,731 acres (excludes reservoirs and SPNM area)

This area contains some of the highest quality winter recreation lands on the ENF as well as a large portion of the Silver Bear Snowmobile Trail. This large area contains excellent terrain for motorized touring and exploring plus expansive vistas including those from the ridge that borders Mokelumne Wilderness. By staging at Tragedy Spring, snowmobilers can start at 7,900 feet elevation and ride extensively in areas above 7,000 feet and up to 8,500 feet. These high elevations are one of the reasons this area is so desirable for winter recreation.

## F. General Best Management Practices

**Non-motorized trailheads** should be established and designated to enhance access to non-motorized areas.

**BAT - Transition of users to cleaner and quieter OSVs** should be encouraged throughout the ENF. The ENF should adopt policies that promote the use of cleaner and quieter snowmobiles. Our Alternative includes a voluntary BAT restriction in two areas in order to promote better opportunity for shared use and a Forest Service commitment to reconsider the imposition of mandatory Forest-wide BAT standards every five years. Due to the scale of impact of just one dirty machine, as more users transition to cleaner and quieter machines there will be greater justification for imposing a mandatory requirement.

The BAT standards adopted by Yellowstone National Park after extensive debate and consideration are reasonable. These published standards should be the starting place for a BAT standard applicable on the ENF. Modifications to the Yellowstone BAT standard as applied to the ENF should be considered at the regional level of the Forest Service.

**Monitoring** adaptive management and enforcement should be established as recommended in our document “BMP Practices.”

**Minimum snow depths** should be 18 inches for cross-country travel and for grooming of OSV trails.

Although we understand the rationale for creating a new limit of 6 inches for OSV travel on designated routes with underlying roads and trails, we believe such a relaxed rule will create more complex enforcement issues and will result in greater destruction of riparian and meadow areas, which are traversed or bordered by such routes. To the extent a relaxation of the minimum snow depth rule is appropriate with regard to a specific route in order to allow OSVs to access higher terrain and legal snow levels, such restriction should be considered on a limited basis where it can be readily enforced and directly serves such purpose, perhaps by designation of a limited number of low-snow access routes.

There already are enforcement issues with regard to areas that have a 12 inch minimum requirement. Snowfalls are uneven, and the same general area may have little to no snow cover in some places and extensive snow cover in others. In low snow years such as the current season, OSVs pushing the limits have caused damage in sensitive areas. Measuring snow depths is often subjective and currently left to user discretion. Accordingly, the ENF should increase the minimum snow depth for cross-country travel to 18 inches to improve compliance and enforcement of responsible OSV usage

We understand that there is some concern as to how the Forest Service would measure and enforce snow depth requirements. We suggest that the ENF follow the example of other National Forests with minimum snow depth requirements. On these forests official snow depth measurements are taken by US Forest Service personnel until the snowpack is at sufficient depth. Measurements are available at District offices, and it is the user's responsibility to check and see whether the snow is deep enough to allow OSV use. On

forests where the snow pack varies throughout the winter season additional measurements occur as conditions warrant.<sup>8</sup> We also suggest implementing seasonal “bookends” before and after which OSV activity is not allowed regardless of snow depth.

We object to the ENF simply referring to State standards with regard to minimum snow depths for grooming and for travel on the groomed routes. To the extent the State of California wants to apply a more stringent limit than 12 inches for general OSV use or 18 inches for grooming activity, that is acceptable. However, the ENF should not defer to State thresholds when they are below the minimums the ENF considers appropriate.

**Nordic trail grooming** for skier use is encouraged in our Alternative through cooperative arrangements with third parties. Such grooming can be done with light equipment that can have impact similar to riding a trail with a single snowmobile. The facilitation of more Nordic trail grooming can significantly encourage Nordic tourism for the benefit of local communities, as well as serving local residents.

**Homeowner access** to cabins and lots by OSV use on designated routes shall be preserved in our Alternative and our Alternative permits additional designated routes where necessary to provide such access.

**Additional trail conflicts** sometimes arise through shared use of trails by skiers, snowshoers, dogs or, more recently, “fat bikes.” Many of these conflicts can be minimized through educating users on shared use principles: having snowshoers and fat bikes stay off ski tracks and ski trails groomed for skate skiing and having owners clean up after their dogs. These responsible practices should be highlighted in the ENF’s winter recreation guide. Trail restrictions or separations may be warranted in certain areas and should be addressed through further collaborative efforts involving local community groups.

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Our Alternative creates a fair balance of recreational opportunity, using restrictions tailored to particular situations. We ask that it be incorporated into the DEIS Preferred Alternative, as well as included as one of the range of alternatives pursuant to the Settlement Agreement.

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<sup>8</sup> See for example, Tongass NF MVUMs: <http://www.fs.usda.gov/detail/tongass/maps-pubs/?cid=stelprdb5430063>. Emergency closures due to low snow conditions can be communicated via online media channels, as with this example from the Chugach NF: [http://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5441982.pdf](http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5441982.pdf).

Sincerely,

SNOWLANDS NETWORK



Marcus Libkind  
President  
[malibkind@snowlands.org](mailto:malibkind@snowlands.org)

WINTER WILDLANDS ALLIANCE



Hilary Eisen  
Winter Wildlands Alliance Recreation Planning Coordinator  
[heisen@winterwildlands.org](mailto:heisen@winterwildlands.org)

**Exhibits and other submissions**

Exhibit A  
*Analyzing OSV Impacts to Other Winter Recreation Users*

Exhibit B  
*Wildlife and Environmental Concerns -- Over-Snow-Vehicles in the Eldorado National Forest*

Exhibit C  
*Snowmobile Best Management Practices for Forest Service Travel Planning*

Exhibit D (submitted on CD)  
*List of Additional Submitted Documents*

Exhibit E (submitted on CD)  
Map titled *Proposed Winter Recreation Management on the Eldorado National Forest*

GIS shapefile for map in Exhibit E (submitted on CD)  
The shapefile is comprised of xxx sub-files