



December 14, 2018

Objection Reviewing Officer Randy Moore, Regional Forester  
USDA Forest Service  
Pacific Southwest Region  
1323 Club Drive  
Vallejo, CA 94592

This letter submitted online at: [objections-pacificsouthwest-regional-office@fs.fed.us](mailto:objections-pacificsouthwest-regional-office@fs.fed.us)

RE: Pacific Crest Trail Association Objection in Response to the Eldorado National Forest Over-snow Vehicle Use Designation Project Draft Record of Decision

Dear Objection Reviewing Officer Randy Moore,

I am writing on behalf of the 13,300 member Pacific Crest Trail Association (PCTA). PCTA is the Forest Service's primary private partner in the management and maintenance of the Pacific Crest National Scenic Trail (PCT). The foundation for this private-public partnership in the operation of National Scenic Trails dates back to the 1968 National Trails System Act. Section 11 of the Act, titled "Volunteer Trails Assistance" states in Sec. 11 (a), "... the head of any Federal agency administering Federal lands, are authorized to encourage volunteers and volunteer organizations to plan, develop, maintain, and manage, where appropriate, trails throughout the Nation." Sec. 11 (b) continues, "Each Secretary or the head of any Federal land managing agency, may assist volunteers and volunteer organizations in planning, developing, maintaining, and managing trails."

The involvement of volunteer and private organizations in the operation of National Scenic Trails was re-emphasized in the 2001 Executive Order 13195, "Trails for America in the 21st Century." The Order states, "Section 1. Federal Agency Duties. Federal agencies will, to the extent permitted by law and where practicable—and in cooperation with Tribes, States, local governments, and interested citizen groups—protect, connect, promote, and assist trails of all types throughout the United States. This will be accomplished by: ... (g) Fostering volunteer programs and opportunities to engage volunteers in all aspects of trail planning, development, maintenance, management, and education as outlined in 16 U.S.C. 1250." Based on this direction, it is PCTA's role to work with the Forest Service to ensure the best possible management of the PCT and the experience it affords trail users, year-round.

PCTA has reviewed the Eldorado National Forest Over-Snow Vehicle (OSV) Use Designation Final Environmental Impact Statement (FEIS), and we applaud the Forest for the Proposed Action (Alternative 2). This Proposed Action meets the legislative requirements established in the National Trails System Act regarding the management of the PCT. As well, this Proposed Action complies with the management direction found in the Forest Service Pacific Crest National Scenic Trail Comprehensive Management Plan. On page 19 (e-page 32), the FEIS proposes,

- "2. Pacific Crest Trail (PCT): Areas designated for OSV use would be at least 500 feet from the PCT. Two OSV trails (0.5 miles) would be designated that cross the PCT to provide connectivity between areas designated for OSV use.
- The designated OSV trails that cross the PCT coincide with TMR Subpart B routes identified on the Eldorado National Forest's Motor Vehicle Use Map. The designated

trails would be approximately 24 feet wide and would extend between the areas designated for OSV use.

- 14N39 Richardson Lake 4WD (in Sourdough segment) – 0.3 miles
- 31070 Lost Lakes Road (in Forestdale/Blue Lakes segment) – 0.2 miles”

PCTA strongly supports these proposed actions as they would support management of the PCT that provides for the nature and purposes of the Trail.

**PCTA’s first objection to the Eldorado National Forest Over-snow Vehicle Designation Project Draft Record of Decision (ROD) which chooses Alternative 5 as the Preferred Alternative is because this alternative proposes to designate OSV use immediately adjacent to the PCT.**

The designation of OSV use adjacent to or along the PCT does not comply with the legal requirements for National Scenic Trail management found in the National Trails System Act, nor the management direction found in the PCT Comprehensive Plan.

PCTA’s position and concerns have already been shared with the Eldorado National Forest staff in our response to the Eldorado National Forest OSV Draft Environmental Impact Statement (DEIS) in July of 2018. In our response to the DEIS, we strongly supported not designating OSV use within 500’ of the PCT to maintain the quiet, primarily non-motorized experience the Trail is intended to provide. Below is clarification as to why this Draft ROD does not comply with the National Trails System Act and PCT Comprehensive Plan. Additionally, language found in the FEIS supports the Proposed Action (Alternative 2) as the best alternative to ensure that the PCT provides the quiet and non-motorized trail experience that skiers and snowshoers are seeking along the PCT.

Based on the language found in the National Trails System Act and the PCT Comprehensive Plan, the Forest Service is responsible for managing the land along the PCT in a manner that harmonizes with the nature and purposes for which the PCT was designated a National Scenic Trail. The National Trails System Act designated the PCT as one of the nation’s first two National Scenic Trails and the Act states in Section 7(c), “Other uses *along the trail, which will not substantially interfere with the nature and purposes of the trail* [emphasis added], may be permitted by the Secretary.” The Act proclaims in Section 3(b), “National Scenic Trails ... will be extended trails so located as to provide for *maximum outdoor recreation potential* [emphasis added] and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the areas through which such trails may pass.” The Act continues, “... efforts shall be made to avoid activities incompatible with the purposes for which such trails were established.” The Act is directing the agency to manage the PCT to maximize the Trail’s recreation potential to provide for a quiet, non-motorized trail experience.

PCTA supports mechanized and motorized recreation on National Forest System lands; however, motorized use immediately adjacent to the PCT does substantially interfere with the nature and purposes of the PCT. Motorized recreation adjacent to the Trail is incompatible with the quiet, non-motorized experience the PCT is intended to provide, year-round.

The National Trails System Act prohibits motorized use along National Scenic Trail and states in Section 7(c), “The use of motorized vehicles by the general public *along* [emphasis added] any national scenic trail shall be prohibited and nothing in this Act shall be construed as authorizing the use of motorized vehicles ...” It is clear from the use of the word “along” that Congress did not intend for motorized use to be adjacent to the PCT. Designating OSV use along the PCT does not comply with this direction found in the Act.

The PCT Comprehensive Plan contains even more specific language addressing winter use. The Plan states, “Snowmobiling on the trail is prohibited but crossing at designated locations is consistent with the purpose of the trail.” The Plan continues, “Snowmobiling along the trail is prohibited by the National Trails System Act, P.L 90-543, Section 7(c). Winter sports plans for areas through which the trail passes should consider this prohibition in determining areas appropriate for snowmobile use.” The use of the word “areas” in the PCT Comprehensive Plan makes it clear that the PCT is not meant to be managed in a manner that only protects the trail tread; rather, the “areas” around the Trail must be managed in a way that does not allow other uses to substantially interfere with the nature and purposes of the PCT. The PCT Comprehensive Plan states, “If cross-country skiing and/or snowshoeing is planned for the trail, *any motorized use of adjacent land should be zoned to mitigate the noise of conflict* [emphasis added].” This last statement makes it clear that OSV use should not occur immediately adjacent to the PCT, and that noise impacts should be mitigated for. If the lands around the PCT are not “zoned” and OSV use is designated adjacent to the Trail, skiers and snowshoers will be displaced and discouraged from using the PCT on the Eldorado National Forest.

Management direction can also be found in Forest Service Manual 2350. The Manual specifically addresses the agency’s responsibility for managing National Scenic Trails as more than just a 24- or 36-inch trail tread. The Manual states on page 29, “Administer National Scenic and National Historic Trail corridors to be compatible with the nature and purposes of the corresponding trail.” FSM 2353.42. This straightforward language found in the Manual directs the agency to manage the area around each National Scenic Trail as an integral part of the Trail. In essence, the entire corridor is the ‘Trail’. This Forest Service direction is based on the National Trails System Act which states in Section 7(a)(2), “Pursuant to section 5(a), the appropriate Secretary shall select the rights-of-way for national scenic and national historic trails and shall publish notice thereof of the availability of appropriate maps or descriptions in the Federal Register... The location and width of such rights-of-way across Federal lands under the jurisdiction of another Federal agency shall be by agreement between the head of that agency and the appropriate Secretary. In selecting rights-of-way for trail purposes, the Secretary shall obtain the advice and assistance of the States, local governments, private organizations, and landowners and land users concerned.”

The term "rights-of-way" does not simply refer to the trail tread and its ability to pass through areas. “Rights-of-way” as used in the Act is synonymous with the term corridor. Although it is beyond the scope of this project to designate a “corridor” around the PCT, designating motorized use along the Trail clearly conflicts with the direction found in the Act and existing Forest Service Manual 2350 that directs the agency to manage the area around National Scenic Trails in a manner that harmonizes with the nature and purposes for which a trail was designated. It is for the reasons cited above in the Manual and National Trails System Act that 500’ is the minimum area on both sides of the PCT that OSV use should not be designated.

Supporting the above legislative and policy direction is language from the Eldorado National Forest Land and Resource Management Plan as cited in the FEIS. The FEIS states on page 59 (e-page 72),

“Management Area 4 – Special Areas (Geological, Botanical, Archeological and National Trails)

Management Emphasis: Manage the areas principally for their recreation use substantially in their natural condition. Preserve the integrity of the special interest features for which the areas were established. (LRMP pp. 4-142)

Management Practice 28-Closed Off-Road Vehicle Management (LRMP pp. 4-145): Close the following Special Areas: Round Top Botanical/Geological, Pacific Crest Trail, Pony Express Trail, and Emigrant Summit Trail (northeast of Horse Creek Saddle).”

The Eldorado Forest Plan provides direction to manage the PCT as not just a 3' wide trail tread, but as an area. Viewed with this direction, designation of OSV use along the PCT would not comply with the Forest Plan direction to preserve the quiet, non-motorized PCT experience.

The FEIS details the impacts of the Proposed Action (Alternative 2) on the PCT on page 75 (e-page 88), “The PCT would remain non-motorized, as it is currently managed. Two designated OSV trails across the PCT would minimize the potential for motorized use to impact the trail experience. Limiting the locations where OSVs cross the trail would enhance the quiet, non-motorized experience while accommodating motorized access to OSV areas. Using the wheeled vehicle roads designated in Subpart B for off-highway vehicle use as PCT crossing trails would limit motorized disturbance to areas of the trail that already contain motorized vehicle trails. In addition, no OSV use would be designated within 500 feet of the PCT to minimize potential impacts on non-motorized recreation opportunities, by eliminating OSV use and reducing the potential for conflict between motorized and non-motorized winter uses along the PCT. Alternative 2 would minimize the potential motorized OSV impacts to the nonmotorized PCT experience to a greater extent than current management.”

In contrast to the Proposed Action the FEIS documents the impacts of Alternative 1 - No Action on the PCT on page 73 (e-page 86), “The PCT would remain non-motorized, as it is currently managed. No OSV trails across the PCT would be designated; OSVs could cross the PCT in any of the areas open to OSV use, potentially impacting the quiet, non-motorized trail experience of snowshoers and cross-country skiers along the PCT. Of the 26 miles of the PCT on the Eldorado National Forest, approximately 11 miles are within areas currently open to OSV use within 500 feet of the trail, potentially impacting the non-motorized trail experience.” The FEIS continues on page 78 (e-page 91) with the description of Alternative 4 impacts on the PCT, “OSV use of the PCT trail itself would continue to be prohibited; however, motorized use within 500 feet of the PCT, and across the PCT could continue to impact the quiet, non-motorized trail experience as described in Alternative 1.”

The Preferred Alternative (Alternative 5) will have many of the same impacts on the PCT experience as Alternative 1 and 4 because this alternative proposes to allow OSV use adjacent to the PCT along 7.5 miles of the PCT. Even with designated crossings identified, allowing OSV use adjacent to the PCT will not ensure that the Trail provides a quiet, primarily non-motorized experience for skiers and snowshoers.

The FEIS clearly describes how the Proposed Action would best minimize user conflicts between non-motorized and motorized users along the PCT by not allowing OSV use within 500' of the PCT. This separation of uses would minimize the impacts associated with motorized OSV use on PCT skiers and snowshoers—air pollution, noise impacts, snow that has been tracked and impacted for skiers. These design features are essential in managing the PCT to provide a quiet, non-motorized trail experience and meet the legal requirements of the National Trails System Act and PCT Comprehensive Plan.

**PCTA’s second objection to the Eldorado National Forest Over-snow Vehicle Use Designation Project Draft ROD is in response to designated PCT crossings that are so large that they essentially open the PCT to motorized use.**

PCTA supports designated crossings of the PCT that are numerous and wide enough, while still following management direction found in the PCT Comprehensive Plan, to allow OSV riders to adapt to changing snow conditions and access important riding areas. The FEIS describes the Preferred Alternative on page 80 (e-page 93), “During the winter, these segments are buried under multiple feet of snow and have use on either side across jurisdictional boundaries. In addition, at these locations snow conditions are highly variable during the course of a winter and pose significant safety concerns including high winds and avalanches and are prone to wind loading of snow and formation of cornices. As a result, crossing areas

have been designed to provide OSV users options to select a safe crossing of the PCT under constantly changing, variable snow loading conditions.”

This rationale to provide for OSV rider safety by permitting riders to select their own crossing of the PCT by allowing for a 0.5 and a 4.5 mile wide crossing points of the PCT is in direct conflict with the intent of designated crossings, which is to minimize the amount and frequency of motorized impacts on PCT users. Proposed designated crossings of 0.5 and 4.5 miles wide is a distortion of the management direction in the PCT Comprehensive Plan. These proposed designated crossing point widths combined with proposing to designate OSV use along the Trail is equivalent to allowing OSV on, along, and across the PCT. This is not in compliance with the National Trails System Act or PCT Comprehensive Plan.

**The following language from the FEIS does not provide adequate analysis to support the rationale of the Draft ROD or is in conflict with existing legislative and policy direction:**

The FEIS argues that because there isn't considerable use along the PCT, motorized impacts will not substantially interfere with the nature and purposes of the PCT. The FEIS states on page 81, “Under this alternative, designated crossing areas would allow OSVs to safely traverse across the PCT. The PCT would remain non-motorized, as it is currently managed. These crossing areas would provide safe, motorized access to OSV areas. Although motorized use adjacent to, and across the PCT may potentially impact the non-motorized experience under this alternative, the PCT receives little to no use along these segments during the winter months. The designated trail crossings would not impact the trail itself, and will not substantially interfere with the nature and purposes of the PCT. The level of use during the summer and fall contribute to higher impacts to the nature and purpose of the PCT along within these segments than the winter.”

PCTA is aware that remote sections of the PCT likely receive much less non-motorized winter use than areas closer to developed facilities; however, if the Forest has determined that there is no winter use in these sections of the PCT, the FEIS should detail the PCT specific visitor use analysis that has been completed that supports the assertion that there are virtually no PCT winter users on the Eldorado National Forest.

The argument that the nature and purposes of the PCT isn't impacted because there aren't any non-motorized users on the Trail does not hold up to management direction from the National Trails System Act. A key tenet of the PCT with its designation as a National Scenic Trail is to provide the opportunity for non-motorized recreation experiences. Although there may not be a considerable amount of winter use on the PCT at this time, given the opportunity for a truly quiet and non-motorized experience, winter use of the trail might be more often utilized by winter travelers. Section 3(b) of the Act states, “National Scenic Trails ... will be extended trails so located as to provide for *maximum outdoor recreation potential* [emphasis added] and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the areas through which such trails may pass.” In the context of this language in the Act, the term “potential” is parallel to “opportunity.” The PCT is intended to provide quiet, non-motorized recreation opportunities for those who seek it out, year-round. To argue that motorized use adjacent to and along the Trail will not substantially interfere with the nature and purposes of the PCT because there are no winter users along the PCT conflicts with this direction for the PCT to provide the opportunities for quiet, non-motorized recreation. The OSV Use Designation Project should not simply authorize current use patterns, but should be forward looking, acknowledge that there is increasing winter non-motorized recreation on public lands, and meet the intent of the National Trails System Act.

To continue this rationale, when National Scenic Trails were first designated, there was no such thing as a “thru-hiker.” Long-distance hiking wasn’t even a phenomenon. Due to the opportunities that were created with the inception and designation of National Scenic Trails, long-distance hiking is more popular than ever. Use of the PCT has increased considerably with people from all over the country and the world traveling to California, Oregon and Washington to walk lengths of the Trail. There has even been a documented case of two winter “thru-hikers” on the PCT.

PCTA would like to address the topic of what constitutes a non-motorized experience along the PCT. The FEIS states on page 68 (e-page 81), “Quality non-motorized winter recreation experiences are typically characterized by quiet activities such as cross-country skiing or snow-shoeing in a natural environment that is not influenced by the sound, smell of exhaust, or sight of snowmobiles.” By this very rationale, how can the PCT provide a “quality non-motorized winter recreation experience” if OSV use occurs along or immediately adjacent to the Trail? The sounds, smells, sights and impacts from snowmobiles will be readily apparent and unavoidable by PCT skiers and snowshoers. This, in all reality, does not provide a non-motorized winter trail experience if an OSV rider can travel, literally, a few feet away from a PCT skier or snowshoer.

The FEIS does not address how the Eldorado National Forest can enforce a 3’ wide closure area along the PCT tread or trail line. How can the Forest realistically enforce such a narrow closure area? Could a Law Enforcement Officer issue a citation that would stand up in court claiming that someone was two feet in the wrong direction and therefore in violation of a closure? PCTA does not feel that the Preferred Alternative to close only the PCT tread to OSV use is enforceable and therefore not a viable alternative.

PCTA believes the FEIS supports the Proposed Action (Alternative 2) in providing the most appropriate management of the PCT that meets the intent and requirements set forth in the National Trails System Act and PCT Comprehensive Plan. The Preferred Alternative that was selected in the Draft Record of Decision seems to be an arbitrary and capricious decision because the FEIS does not explain how this alternative provides for the nature and purposes of the PCT.

### **Proposed Remedies:**

PCTA’s first proposed remedy is to include the below design features, found in the Proposed Action, to the Final ROD:

- “Pacific Crest Trail (PCT): Areas designated for OSV use would be at least 500 feet from the PCT. Two OSV trails (0.5 miles) would be designated that cross the PCT to provide connectivity between areas designated for OSV use.
  - The designated OSV trails that cross the PCT coincide with TMR Subpart B routes identified on the Eldorado National Forest’s Motor Vehicle Use Map. The designated trails would be approximately 24 feet wide and would extend between the areas designated for OSV use.
    - 14N39 Richardson Lake 4WD (in Sourdough segment) – 0.3 miles
    - 31070 Lost Lakes Road (in Forestdale/Blue Lakes segment) – 0.2 miles”

PCTA’s second proposed remedy is to identify and designate crossings of the PCT that provide adequate crossing opportunities for OSV riders, while not being so wide that they essentially open the area adjacent to and along the PCT to OSV use. PCTA supports designated crossings of the PCT up to a maximum width of **one-eighth of a mile** for OSV riders to adjust to changing snow conditions and crossing opportunities. If the Forest cannot find adequate crossing locations that are discrete points no wider than one-eighth mile wide, then the Forest should not designate a crossing in these areas and/or find another

location for a designated discrete crossing of the PCT. PCTA is ready and willing to work with the Eldorado National Forest staff and OSV stakeholders to identify needed and specific designated PCT crossing points.

Incorporating these remedies in to the Final ROD will allow the Forest to comply with the National Trails System Act and PCT Comprehensive Plan and support the Trail in providing a primarily quiet and non-motorized trail experience, year-round. These features will also help to meet aspects of the project's Purpose and Need to, "promote the safety of all uses, enhance public enjoyment, minimize impacts to natural and cultural resources, and minimize conflicts among the various uses." Not designating OSV use will also better meet the expectations of PCT skiers and snowshoers, as acknowledged in the FEIS. "Areas of specific concern to non-motorized users who are typically seeking a quiet recreation setting that is not influenced by the sound of motorized vehicles include cross-country ski trails, *the PCT* [emphasis added], Wilderness, and Primitive and Semi-Primitive non-motorized ROS classes."

### **Concern with the Draft ROD rationale:**

The Draft ROD states on page 6, "Additionally, the forest received many comments that underscored concern about designated crossings and the exclusion of areas adjacent to the Pacific Crest Trail proposed under Alternative 2. These comments pointed out significant safety and feasibility concerns posed by these designations. Designated crossings limited to existing road crossings proved to be illogical and unsafe in winter conditions at these locations. While the majority of the PCT is located within areas not designated for OSV use, Alternative 5 includes two segments of the PCT located within designated OSV Areas. They are located in areas along high elevation mountain ridgetops on the Sierra crest at elevations above 8,000 feet. During the winter, these areas are buried under multiple feet of snow and have use on either side across jurisdictional boundaries. I am concerned that at these locations snow conditions are highly variable during the course of a winter and pose significant safety risk to the public. Conditions at these locations include high winds and avalanches, and are prone to wind loading of snow and formation of cornices. Alternative 5 will allow OSVs to traverse across the PCT at various locations depending upon weather and snow conditions. As a result, I believe the crossing areas designed under Alternative 5 will provide for much safer crossings while minimizing impacts to the nature and purpose of the PCT as a non-motorized trail."

PCTA believes this rationale is overzealous to suggest that because designated crossings may provide hazardous or unsafe crossing opportunities, OSV use should be designated right up to the edge of the PCT and that crossing locations should be 0.5 and 4.5 miles long. Again, this is tantamount to opening the PCT to unregulated motorized use, which is illegal.

PCTA appreciates the concerns addressed in the paragraph above from the Draft ROD. However, these concerns can be addressed by designating additional PCT crossings that are up to one-eighth of a mile wide to provide more frequent crossing locations between OSV riding areas, while still not designating OSV use within 500' of the PCT. Or, if the Deciding Official is concerned about public safety, then perhaps the Forest should consider these areas to be closed to motorized use. To be clear though, PCTA is not advocating for large areas away from the PCT to prohibit OSV use.

PCTA also believes that the Eldorado OSV Draft ROD will not hold up to scrutiny from the Forest Service Pacific Southwest Regional Office. As PCTA is an objector to the Lassen National Forest Over-snow Vehicle Use Designation Project, we received the objection response from the Regional Office that provides direction to the Lassen National Forest. The response specifically points out that the Lassen National Forest RFEIS alternatives that do not designate OSV use adjacent to the PCT best meet the intent of the PCT Comprehensive Plan, minimize user conflicts, and provide a quiet setting. The response

stated, “Analysis of impacts of OSV use adjacent to the trail and an explanation of how the nature and purposes of the PCT are being maintained when use is designated adjacent to the trail is missing.” In the section, “Instructions to the Responsible Official”, the response directs the Lassen National Forest to, “Clarify how the nature and purposes of the PCT are being maintained for each alternative. Provide additional rationale that draws from the analysis for the decision related to OSV use adjacent to the PCT.” If the Lassen National Forest is directed to rely on their own analysis (the RFEIS) to provide for the nature and purposes of the PCT, we would expect that the Eldorado National Forest will receive similar direction. Language from the Eldorado FEIS makes it clear that not designating OSV use adjacent to or along the Trail best provides for the nature and purposes of the PCT.

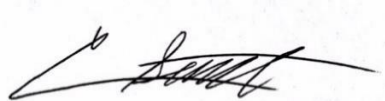
It is for the reasons addressed above that we urge the Eldorado National Forest to adopt our suggested remedies not to designate OSV use within 500’ of the Pacific Crest National Scenic Trail, as well as designate OSV crossing points of the PCT that are a maximum of one-eighth mile wide. With the incorporation of these remedies, the project will provide for the nature and purposes of the Pacific Crest National Scenic Trail.

Forester Moore, we appreciate your time and consideration of PCTA’s objection to the Eldorado National Forest Over-snow Vehicle Use Designation Project Draft Record of Decision. We look forward to discussing our objection with you and your staff.

Sincerely,



Justin Kooyman  
Associate Director of Trail Operations



Connor Swift  
Northern Sierra Regional Representative

CC:

James Bacon, U.S. Forest Service, Pacific Southwest Region, Director of Public Services  
Beth Boyst, U.S. Forest Service, Pacific Crest Trail Program Administrator  
Laurence Crabtree, U.S. Forest Service, Eldorado National Forest Supervisor  
Liz Bergeron, PCTA, Executive Director and CEO  
Jennifer Tripp, PCTA, Director of Trail Operations



**From:** [Marsolais, Jennifer - FS](#)  
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**Subject:** FW: PCTA Objection in Response to the Eldorado OSV Use Designation Project Draft ROD  
**Date:** Monday, January 28, 2019 8:24:00 AM  
**Attachments:** [image001.png](#)  
[PCTA Objection--Eldorado OSV Use Designation Project Draft ROD--December 2018.pdf](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

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**Jennifer Marsolais**  
**Forest Environmental Coordinator**

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**From:** Justin Kooyman [<mailto:jkooyman@pcta.org>]  
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**Subject:** PCTA Objection in Response to the Eldorado OSV Use Designation Project Draft ROD

Dear Regional Forester Randy Moore,

Attached to this email is the Pacific Crest Trail Association's objection in response to the Eldorado National Forest Over-snow Vehicle Use Designation Project Draft Record of Decision (ROD). PCTA is the Forest Service's primary private partner in the management and maintenance of the Pacific Crest National Scenic Trail.

We are objecting to the Eldorado National Forest OSV Use Designation Project Draft ROD, which proposes to allow OSV use immediately adjacent to the PCT, because we do not believe the Draft Decision complies with the National Trails System Act or the Forest Service Pacific Crest National Scenic Trail Comprehensive Management Plan. It is our intention to work with the agency in a cooperative manner and in the spirit of partnership to ensure this project's final Decision supports management of the PCT that provides for the nature and purposes of the Trail.

We greatly appreciate your time and effort considering PCTA's objections, and look forward to meeting with you and the planning staff to resolve our concerns. Please do not hesitate to contact me with any questions or follow up you would like to have.

Thank you,

**Justin Kooyman**

*Associate Director of Trail Operations*

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[www.pcta.org](http://www.pcta.org)

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