

From: Travis Feist

[REDACTED]
South Lake Tahoe, CA
96150

RE: Eldorado OSV management plan FEIS/draft ROD, USFS project # 46034

Responsible Official: Randy Moore

I very much appreciate that this project's Purpose and Need acknowledged that current OSV use is generally manageable, but that the Eldorado *needs to provide improved access for OSV uses* (chapter 1, page 12).

I also appreciate that the Draft ROD includes this statement from Mr. Crabtree: *I am concerned with the lack of access for motorized winter recreation opportunities within the higher elevations on the Eldorado National Forest. There is only one established trailhead, Iron Mountain Sno-Park, which provides adequate parking for motorized recreation access with only limited access through adjacent Forests on the east side of the Sierra Nevada. On the contrary, there are three Sno-Parks within the Eldorado National Forest which provide access for non-motorized recreation. There is also a variety of non-motorized opportunities provided by Kirkwood Ski Resort, Sierra at-Tahoe and Adventure Mountain all under Special Use Authorization. For this reason, I find it important to be responsive as I can to these few, remaining OSV opportunities within these high elevations on the Forest* (page 6).

I further appreciate that the Eldorado isn't planning extreme closures to snowmobiles, and showed restraint regarding closures near the PCT. This is a difficult process, and the Eldorado has produced a generally reasonable plan.

However, there are some specific issues where I feel the Eldorado failed to recognize the cumulative effects of small OSV closures. These small closures incrementally add up to larger impacts that contradict the above quotes from the Purpose and Need and the Draft ROD. It's because of these cumulative effects that I file this objection. In my comment on the DEIS (letter #231), I addressed several of these topics, both specifically and in general.

1. PCT crossings. My comment included: "It's very clear in the National Trails System Act that management of adjacent multiple use land subjugates the PCT - not the other way around (section 7a). *Development and management of each segment of the National Trails System shall be designed to harmonize with and complement any established multiple use plans for that specific area in order to insure continued maximum benefits from the land.* Not only would closing a corridor or limiting crossings be in violation of the National Trails System Act, it would be addressing a problem that doesn't exist, and therefore represent an arbitrary closure of adjacent lands to snowmobilers. All of the regional Forests that manage lands that the PCT crosses need to coordinate to create a new Management Plan for consistency between forests. The '82 plan is outdated by any measure applied to

other USFS management plans, and was written for a different era with different use patterns. And it violates section 7a of the National Trails System Act.”

Although the Eldorado established reasonably wide crossings in some areas, it failed to identify an important crossing on Eldorado managed lands near Indian Valley and Little Indian Valley. The Eldorado also seems to have forgotten to designate Tamarack Road, immediately adjacent to the PCT in this area. These two closures are probably oversights, but cumulatively they close an important OSV passage between two otherwise open areas.

I maintain my original suggestion that the Eldorado and other regional forests *first* create a new PCT Management Plan that’s based on the National Trails System Act, *before* regional forests create individual OSV plans addressing winter management of the PCT. To produce the OSV plan first, leave PCT crossings out of it, and use simple yet enforceable language instead: “Crossing the PCT is allowed, but riding OSVs *along* the PCT is prohibited.”

2. The area between Carson Pass and Echo Summit. My comment included: “There is already plenty of terrain closed to motorized use, including seemingly endless terrain from parking areas at Carson Pass and Echo Summit – the only 2 high elevation parking areas that access reliable winter snow on Eldorado managed lands. Neither of these SnoParks allow motorized access.” The closed terrain I referenced was Desolation Wilderness managed by both the LTBMU and the Eldorado, “Meiss Country” managed by the LTBMU, Mokelumne Wilderness managed by the Eldorado, Stanislaus, and the Humboldt Toiyabe, and Caples Creek Proposed Wilderness managed by the Eldorado.

Current management by the Eldorado actually has some remaining terrain open to OSV use between Carson Pass and Echo, but the FEIS’s Preferred Alternative includes two more small closures that cumulatively close the whole area to all but a few expert snowmobilers during winters with unusually deep and low elevation snow. The proposed OSV access from Carson Pass is via very steep, SW facing terrain unlikely to hold snow, and from Echo is via Sayles Canyon, which is low elevation, steep, and heavily treed. This is in direct opposition to Mr. Crabtree’s stated concern for high elevation OSV access. Considering the impressive inventory of already closed lands, the Eldorado should try harder to preserve some OSV access between Carson Pass and Echo.

I believe the Eldorado could find creative solutions near both Schneider Cow Camp (Carson Pass) and Pilot Peak (Echo) to preserve OSV access to the high country between, and I implore the Eldorado to work with the special use permittees in these areas before closing access permanently. Each area has land not actively or not regularly used for permitted purposes, and also has existing summer roads that could remain open to OSV use with minimal impacts on commercial operations. Those details could be worked into annual permit renewals instead of this more permanent OSV plan. Kirkwood Nordic has a poor history of maintaining parking and groomed trails near the Caples Maintenance Station/Schneider Cow Camp, so the Eldorado could allow some type of conditional OSV access there instead of the permanent closure. The operators of Adventure Mountain have expressed a willingness to allow OSV access, and they could charge for parking, so the Echo OSV access could truly be a “win-win.” Both

options deserve further exploration before permanent closure. Leave current Carson Pass and Echo access intact in the OSV plan, then work with Kirkwood Nordic, Adventure Mountain, and regional snowmobile clubs to agree to mutually beneficial details.

3. The high country northwest of Desolation Wilderness (Loon Lake, Van Vleck, the Rubicon, and the PCT near Sourdough Hill). This area is vital to OSV users because of its high elevation, an important characteristic as Mr. Crabtree noted. The FEIS's Preferred Alternative has similar cumulative effects as described above in #1 and #2. Keep the area near the Van Vleck bunkhouse open to OSV use. Regarding Sourdough Hill, see my earlier recommended language for PCT management. Also in this area, there is a confusing array of FS, county, and private roads and lands, and it appears that the Eldorado failed to keep some roads opened that it could have and/or closed roads it didn't have authority to, and closed areas where parking is important for continued OSV access on non-FS routes. Please review this area very closely before permanent closures, and keep OSV access open to the Rubicon by including parking for the Rubicon, and keep access open via Wentworth Springs Road, 14N05, 14N06, 14N27, and 14N34.

4. 12" minimum snow depth. 12" of low density snow does not protect resources like 12" of high density snow, and 10" in the parking lot might be 20" right around the corner. Using a 12" minimum is not science-based, is problematic due to the high variability of snow depths in a mountain environment, and may be very difficult to enforce. A vocal minority user group is eager to police the OSV community, and eager to sue the Eldorado for failure to enforce this detail of the OSV plan. Don't encourage one user group to intentionally engage in conflict with another, and don't set yourself up for litigation by including a 12" minimum snow depth (or 6" on groomed trails). Instead, use language like, "Snow coverage must be sufficient to minimize soil damage." This effectively captures the intent of the 12" minimum without the associated problems.

Thank you,

A handwritten signature in blue ink that reads "Jamie Faust". The signature is written in a cursive, flowing style.

From: [Brown, Nevia -FS](#)
To: [Marsolais, Jennifer - FS](#)
Subject: FW: ENF OSV Project
Date: Friday, December 21, 2018 8:04:30 AM
Attachments: [Eldorado obj Feist.pdf](#)

From: Travis Feist [mailto:travisfeist@yahoo.com]
Sent: Monday, December 17, 2018 5:24 PM
To: FS-objections-pacificsouthwest-regional-office <objections-pacificsouthwest-regional-office@fs.fed.us>
Subject: ENF OSV Project

Please see the attached for my objection to the Eldorado OSV management plan FEIS/draft ROD, USFS project # 46034