

Lead Objector: Kevin Bazar Sierra Snowmobile Foundation PO Box 956 Kings Beach, CA 96143 kwbazar@gmail.com

Commenter 296 in FEIS Vol 2

RE: Eldorado OSV management plan FEIS/draft ROD, USFS project # 46034 Responsible Official: Lawrence Crabtree, Supervisor Eldorado National Forest Reviewing Officer: Randy Moore

The Sierra Snowmobile Foundation was formed in the Spring of 2018 when the need for a more competent and cohesive voice for the OSV community was identified. This need resulted from the forthcoming OSV management plans in California. We are a fully volunteer 501c3 organization and constitute both OSV users and regular backcountry skiers.

Throughout this process, the Eldorado National Forest staff, the Supervisor, the Environmental Specialist as the project leader, and relevant advisors and specialists have made themselves available, and open to discussion about logical implementation of this management plan. Not only does the Sierra Snowmobile Foundation appreciate this, we recognize the important relationship that has developed. We very much respect and appreciate this relationship going forward in OSV management. The Eldorado National Forest is to be commended. Below you will find comments/objections/responses related to the FEIS/draft ROD issued on Oct 31, 2018.

# Pacific Crest Trail

### Pg E-88 FEIS vol2

**199. Comment (Commenter 296):** Buffers and designated crossings would represent a management change that should be appropriately addressed in and updated PCT management plan, not a limited and specific interpretation of the existing 32 year old document. Dove tailing this into an OSV management plan is neither appropriate nor relevant as neither goal in the purpose and need for this decision specifies anything about the PCT. The PCT spans 3 large states and a multitude of forest management areas. Consistency is not achieved by assigning piecemeal management strategies that change every time a new forest is encountered.

Restricting OSV use near the PCT serves no trail users whatsoever as it is the PCT parking areas that are used far more than the PCT itself. The trail becomes indistinguishable from the winter landscape under several feet of snow. There are several roads within the ENF that cross the PCT during the summer and are not treated as such during the summer.

**Response:** The PCT Comprehensive Plan directs the agency to not only consider the prohibition of snowmobiling along the trail in determining areas appropriate for snowmobile use, but mitigate the noise of conflict along the Trail when winter motorized use occurs on adjacent land **when cross-country skiing and/or snowshoeing are planned for the Trail.** The FEIS presents a range of alternatives providing different possibilities for the ENF to manage winter use near the PCT, while providing a balance between motorized and non-motorized opportunities in these areas (FEIS pgs. 16-33).

We strongly support the removal of non-motorized buffer zones around the PCT, as carried forth in Alternative 5. As stated in the PCT management plan on Pg 25 (Recommendations for Disposition or Revision of Existing Agreements, Regulations and Criteria), referencing MOUs with the National Park Service and Bureau of Land Management:

### -delete language that requires the establishment of zones or corridors

Although directly referencing MOUs with partner agencies, the intent of this statement is clear: zones and corridors defining use surrounding the PCT are not appropriate. This applies to non-motorized corridors which do not exist in summer months when the trail is actually being used regularly. Corridors have no place in winter management when the trail is more difficult to follow, reach, much less even find.

# Additionally:

From page 21 of the PCT mgt plan:

Winter use (cross-country skiing and snowshoeing) should be accommodated **where practical and feasible.** 

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. Winter sports brochures should indicate designated snowmobile crossings on the Pacific Crest Trail where it is signed and marked for winter use 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.

The areas proposed for PCT crossing zones are not 'practical and/or feasible' for cross-country skiing or snowshoeing therefore these uses have never been signed and marked for winter use. Nor is skiing and snowshoeing 'planned' for the trail as most of these areas are far beyond

where such uses can be expected to occur from plowed trail heads. The draft ROD ignores the tenet *where practical and feasible,* and wrongly ignores the condition of trail signage for winter use to assign designated crossings.

In addition, Pg 21 references the specific portion of the National and scenic trails act:

Section 7(a) of the 1968 Act establishes the relationship between the trail and the management of adjacent land:Management and development of each segment of the National Trails System shall be designed to harmonize with and complement any established multiple use plate for that specific area in order to ensure continued benefits from the land.

Within Federal lands outside National Parks and Wilderness (57% of the trail), the trail must co-exist in harmony with all other resource uses and activities of the land as determined through the land management planning process. The trail will cross a mosaic of areas differing in primary management emphasis. This could be grazing, key wildlife habitat, special interest such as scenic or geologic, developed recreation, unroaded recreation research natural, or intensive timber management. Viewing and understanding this array of resources and management is one of the primary recreation opportunities to be made available over these portions of trail. Some activities such as road construction, logging, prescribed burning, herbicide application, mining, etc., will require considerable informational and interpretive skills to be placed in a positive perspective from the standpoint of the user. The agencies should look at this as an opportunity to explain the multiple-use concept,

It is anticipated that even though some resource activities may occur immediately adjacent to or across the trail, the agencies will protect the integrity of the trail proper by modifying management practices as needed.

Timely construction of and signing of temporary locations to avoid other resource activities such as logging and road construction is essential to maintaining a safe and enjoyable trail for the users and will do much to mitigate any negative feelings.

Long-standing OSV use outnumbers winter hiking or horseback use by multiple orders of magnitude in pretty much every winter landscape on the Eldorado not contained in Wilderness. The idea that logging and resource extraction can occur adjacent to and even over the trail in summer months when the trail is being used, yet OSVs cannot cross this impenetrable barrier outside of designated crossings when no one is on the trail can not appropriate. Designated, allowed crossings and the resulting no-crossing zones to protect zero users, ones unable to even find an unmarked trail several feet under snow should not be designated on the PCT. Intelligent management would indicate designated *no-crossing zones* near trail heads, and simple caution and awareness beyond these staging areas. Dirt singletrack trails are not put in

place for winter use. The sooner the Eldorado, Region 5 and the PCTA acknowledge this, the sooner we can coexist in reality.

The MOU between the Pacific Crest Trail Association with multiple agencies from 2015 mentions nothing of winter management<sup>1</sup>, and hence nothing of designated crossings or managing for winter use, so deference must be given to the woefully out of date PCT management plan addressed above. This MOU also lays out framework for coordination with these agencies, which would be required if designated crossings were to be implemented, since this represents a change in management from summer conditions, where designated crossings are not implemented. This was not done with CA state parks which manages OHV use in California.

This MOU also does not serve as a legally binding document were the PCTA to continue to advocate for the use of designated crossings in the OSV management plan.

The National Scenic Trails Act, its amendments, and the PCT management plan lay out a framework for public participation in administering the uses, maintenance and management of the trail, and the public interests including those of OSV users must be considered. Although a relationship is established through the MOU, the PCTA is not granted legally binding *exclusive* partnership.

Objection and Remedy: Remove designated crossings and resulting no crossing zones more than 1 mile from PLOWED PCT parking access points. Although the FEIS is vastly improved by expanding proposed crossing sizes in the now preferred alternative 5, the very existence of designated crossings (and resulting no-crossing zones) multiple miles from plowed trailheads above Lost Lakes, behind The Nipple, by Richardson Lake and by Blue Lakes Road does not match the intent, nor does it meet the qualifying tenets of designating crossings in the PCT management plan. The Forest's failure to identify an important crossing near Indian Valley and Little Indian Valley, further indicates that true use patterns are poorly understood.

Remedy: Remove all references to snowmobile crossing areas or crossing zones in places that are not practical or feasible for non-motorized activities.

# Snow Depth

A surrogate for snow depth was presented in our comments on pg 4 (snow water equivalent), and mention of its use in future management is appreciated. However, as mentioned in our comments: The inherent inadequacies of using snow depth alone are well understood. Packed or unpacked, new or old, drifted or scoured, cold and frozen or warm and slushy, depth alone does not sufficiently represent the carrying capacity of snow to provide the necessary barrier to protect resources. It has traditionally been understood that resource damage is the true

<sup>&</sup>lt;sup>1</sup> https://www.pcta.org/wp-content/uploads/2012/11/PCTA\_MOU\_executed.20150512.pdf

indicator of whether OSV use is appropriate. This guideline should continue to be the defining metric.

This concern is still valid and has not been adequately addressed since snow *depth* and not carrying capacity is still part of the proposed Alternative 5.

The the draft ROD contains the following statement:

Monitoring and enforcement will be focused on resource damage rather than strict adherence to snow depth measurement. A full description of monitoring and enforcement appears in the FEIS on pages 28-30

The Monitoring and Enforcement portion of the FEIS (pages 26-28) lays out education, warnings and citations as the means of action, just below discussion of monitoring of snow depth. These are contradictory with the statement in the draft ROD.

Objection and Remedy: Remove snow depth minimums and focus on resource damage, violations for which are already well established in existing law. For a definition of adequate snow cover use the following: Adequate snow cover is defined by a layer of dense, packed snow, or deeper fresh snow sufficient to support your OSV, and prevent damage to forest resources. Use of this definition provides for the variability of snow density, and states the overarching goal outright to remind users.

### Elevation as management prescription

### From Pg 22 FEIS

# Alternative 5– Preferred Alternative

Alternative 5 was developed in response to public comments that highlighted areas with important high elevation opportunities along the Sierra crest (i.e. Blue Lakes, Richardson Lake) for both motorized and non-motorized backcountry recreation and high elevation areas important for non-motorized winter recreation opportunities and/or that were historically closed to OSV use(i.e. Loon Lake Recreation Area, Van Vleck, Echo Summit, and areas south of Carson Pass, including Woods Lake). In addition, this alternative designated areas for OSV use generally at or above 4,000 feet in elevation.

Once adequate snow cover is defined, arbitrary use of elevation as a screening threshold is redundant. Snowpack varies across elevations widely on the western slope and its use serves only to unnecessarily hinder OSV travel when sufficient snow cover exits. Additionally unless the Forest plans on marking topographic lines in the forest with signage, this border definite open vs. closed is not something the Forest can manage. If adequate snowcover exists on Wentworth Springs road by Stumpy Meadows Reservoir at 3,000', users cannot be expected to drive further up a snow covered road until reaching to 4,000 feet to begin OSV travel.

Objection: Elevation as management strategy is redundant in impossible to enforce.

Remedy:Define adequate snow cover appropriately and remove elevation as a standard for not designating areas open to OSV use.

### Designation of routes through non-FS managed lands

Objection: The FEIS fails to designate Tamarack Road, south of Blue Lakes Road as open to OSVs. Given that this route travels through non-Forest lands, this route must be marked on the OSVUM to allow legal passage. This seems an oversight since since the Blue Lakes 'Area' is deliberately designated as open at the other end of the road.

Remedy: Designate Tamarack/Sunset Lake Road (FS 097) as open on the OSVUM.

### Loon Lake Winter Recreation Area

### Pg E-34 FEIS, Vol 2

**64. Comment (Commenter 296):** Loon Lake Winter Recreation Area - Forest order 03-89-04 states "the following act is prohibited in the area known as Loon Lake Winter Recreation Area during the period of November 1 to May 1 of each year, as shown on exhibit 1, under my jurisdiction:

(1) Possessing or using a vehicle off forest development roads 36 CFR 261.56"

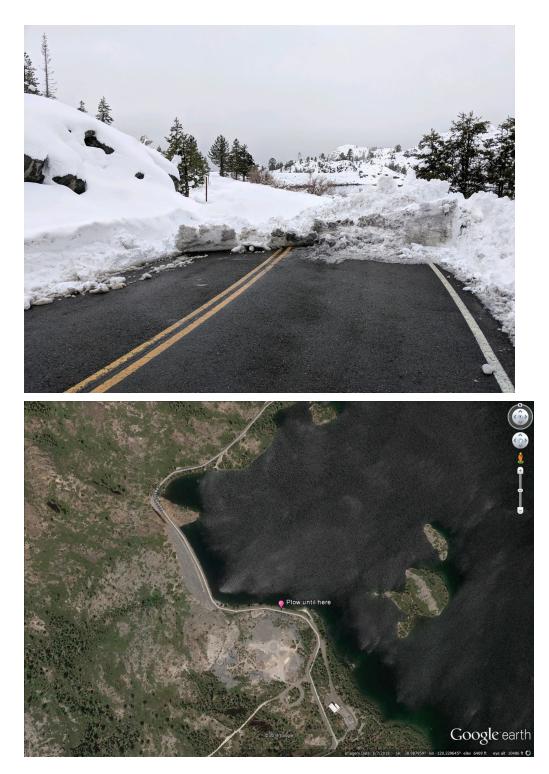
Throughout the DEIS this order is used as an accepted justification to designate the entire north end of Loon Lake as non-motorized, including the Rubicon Trail. This is both outside of the scope of this document as the Rubicon Trail is an Eldorado County Road, and inconsistent with the language in the order itself.

These forest orders (also mentions Echo Summit) should be lifted or clarified, or at the very least the verbiage acknowledged that winter travel on roads in these areas is permitted. We would like to see these areas opened or at the very least a travel corridor established through them.

Response: The Forest Service agrees that the county road within the Loon Lake Winter Recreation Area is not under Forest Service jurisdiction. This OSV Use Designation Project will produce an Over-snow Vehicle Use Map (OSVUM), which will replace the need for forest orders. The OSVUM will improve information available to the public about opportunities for OSV use and will be more effective for enforcement. (FEIS pgs. 10, 27, and 79).

Objection: While acknowledging Eldorado County jurisdiction over County Rd 147 (Icehouse Rd), the OSVUM needs to allow for parking to stage for OSV use to access the Rubicon Trail on the county road. Sacramento Municipal Utility District (SMUD) plows the road well past the Ski Chalet (pic below, with plowing location provided by SMUD). Plowing stops just short of the secondary auxiliary dam, and creates a winter trailhead. The Forest has no Jurisdiction over this roadway, and legal parking must be indicated on the OSVUM. Prohibition of OSV use

surrounding Loon Lake has precedent, but OSV egress to the Rubicon Trail must be provided for.



### Alternative Access to the Rubicon Trail

In extensive discussions with the project leader, a need was identified to provide access to the proposed OSV open area northwest of Loon Lake (which we support), that does not conflict with existing non-motorized use around the ski chalet at Loon Lake. In order to better facilitate access to this area beyond the legal access point on the county managed Icehouse Road, access to Wentworth Springs Road by Gerle Reservoir was discussed. While this location is notably lower in elevation and subject to more variable snow cover, this staging area should be highlighted on the OSVUM as a staging option.

In addition, portions of Wentworth Springs Road, 14N05, 14N06, 14N27, 14N34 pass over non forest parcels.

Objection and Remedy: Identify staging by Gerle Creek on Eldorado County Rd 63, and routes 14N05, 14N06, 14N27, and 14N34 through non forest lands as trails in order to facilitate legal passage

### Areas east and north of Van Vleck Bunkhouse

#### From Pg 22 FEIS

# Alternative 5– Preferred Alternative

Alternative 5 was developed in response to public comments that highlighted areas with important high elevation opportunities along the Sierra crest (i.e. Blue Lakes, Richardson Lake) for both motorized and non-motorized backcountry recreation and high elevation areas important for non-motorized winter recreation opportunities and/or that were historically closed to OSV use(i.e. Loon Lake Recreation Area, Van Vleck, Echo Summit, and areas south of Carson Pass, including Woods Lake). In addition, this alternative designated areas for OSV use generally at or above 4,000 feet in elevation.

Objection: The FEIS falsely implies that there is somehow not a plethora of available non-motorized opportunity available in the Eldorado already available in Mokelumne Wilderness (easily accessible immediately from Carson Pass, Desolation Wilderness (easily accessible from the South at Echo Summit, the West at Loon Lake, and the East from multiple locations in the Tahoe Basin), in addition to the traditional Loon Lake XC ski area and Chalet. The need to further designate areas such as that around the Van Vleck Bunkhouse is redundant and excessive to meet non-motorized recreation needs.

Remedy: Designate the area north and east of the Van Vleck Bunkhouse as open to OSV use. This use would already be contained by existing boundary designations in the Forest Plan, and certainly continue to provide ample non-motorized recreation opportunities nearby.

#### Echo Summit/Sayles Canyon Access

**68. Comment (Commenter 296)**: Echo Summit and Adventure Mountain - There is effectively zero motorized opportunity available at Echo Summit proper on Hwy 50. Forest order 03-81-10 states "Pursuant to 36 CFR 261.50(a), the following act is prohibited during the period of November 1 to May 1 of each year, in the area known as Echo Summit Nordic Area, as shown on Exhibit 1, under my jurisdiction:

(1) Possessing or using a vehicle off forest development roads 36 CFR 261.56" Not only is this 'temporary' forest order 23 years old, it is an extension of a 37 year old order that was signed into perpetuity in 1995. This order mentions nothing of specific OSV use, most likely because the designation for such use did not exist. The DEIS states this as an example of 'areas' closed to OSV use when it's clear the intent is to address wheeled vehicle use from occurring on snow and/or soft dirt during a 'muddy' season off of existing road Grades.

There is a large swath of land essentially eliminated from access by the relatively small facility (Adventure Mountain). A reasonable corridor for OSV travel should be provided, one that will not interfere with the activities of Adventure Mountain. This would not in any way contradict or supersede existing forest orders or the approved special use permits. The entire north side of Echo Summit, including the scenic Echo Lakes area is essentially non-motorized. This would be a way to both provide OSV opportunities on Echo Summit, and allow a reasonable access corridor to the Sayles Canyon area. The Sayles Canyon areas is currently open, open in the proposed Alternative, however the only access sits at a much lower elevation and requires parking on private property.

**Response:** Thank you for your comment. This OSV Use Designation Project will produce an Over-snow Vehicle Use Map (OSVUM), which will replace the need for forest orders. The north side of Highway 50 at Echo Summit is the Echo Lakes Sno-Park, which provides access to high elevation cross-country, snowshoeing and other non-motorized recreational pursuits and does not currently allow snowmobile parking

(http://ohv.parks.ca.gov/?page\_id=23070 and FEIS pg. 24). Adventure Mountain, under special use permit, is a popular snow play area which provides a variety of non-motorized recreational opportunities such as cross-country skiing, snowshoeing and sledding on the south side of Echo Summit (FEIS pg. 24). In addition, Sierra-at-Tahoe ski resort, also under special use permit, is also located on the south side of Highway 50 near Echo Summit (FEIS pg. 26).

Objection: Repeating the comment by reiterating its points fails to adequately address the content of the comment. There is reasonable access to Sayles Canyon along the eastern edge of Huckleberry Ridge via the road to the radio tower behind the Adventure Mountain special use area (FS rd 11N06Y). The revised proposal Alternative 5 removes this area and the road from designated as open. This in conjunction with the Kirkwood Cross Country Special Use permit area on Schneider Cow Camp road, from Hwy 88 by Caples lake serves to effectively close off

access to the Sayles and Strawberry Canyon areas designated as open. The extremely limited winter parking available at the mouth of Sayles Canyon does not serve to sufficiently provide access to this area. (pic below from Google Earth street view)



The draft ROD contains the following statement (Pg 6):

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.

Failure to leave access open behind Adventure mountain only exacerbates this concern.

Passage of OSVs would occur well outside the Sierra at Tahoe ski area special use area. A route behind the Huckleberry Canyon backcountry area accessed from the ski area could be signed for OSV passage to the designated as open Sayles Canyon area. We can help with this.

I've been in Contact with the proprietor of Adventure Mountain in an effort to establish some limited non-trailer OSV parking in a small portion of their parking lot on weekdays with the business is somewhat slower than on weekends. Email below:

Snowmobiling	at	Echo Summit	Inbox x
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-	jim mueller to me –	Thu, Dec 13, 2:09 PM (2 days a
	Hi Kevin,	
	It was good to speak with you today about the snowmobiling communities need to keep snowmobiling open in our area and possible use of our permit area for staging snowmobiles from.	I look forward to discussing this further with you.
	Sincerely,	
	Jim <mark>Mueller</mark> Adventure Mountain Lake Tahoe	
	Adventure mountain Lake fange	
	Reply Forward	

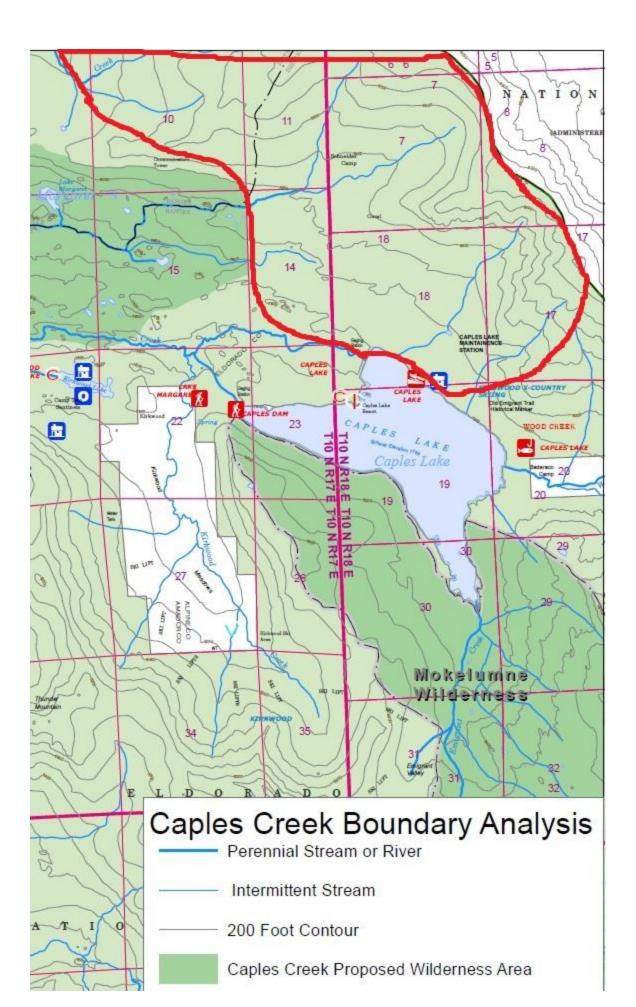
Remedy: Leave the area and Rd 11N06Y open to OSV use, as displayed in Alternative 1 in order to provide access to upper Sayles and Strawberry Canyons.

#### Schneider Cow Camp Rd/Sayles Canyon

Objection: As mentioned above, access to Sayles Canyon has not been adequately provided for. The FEIS designates the area around Schneider Cow Camp Road as open to OSV, but the road itself (Alpine County Road 164, then 10N13 and on Eldorado NF MVUM) falls under the special use permit for the Kirkwood Cross-Country ski area network as well as Alpine County jurisdiction over which the Forest does not preside. Per discussions with the project leader, there exists an area between Schneider Cow Camp Rd and the Caples Creek Proposed Wilderness Boundary where OSV passage could be accommodated for to reach Sayles Canyon. See pic below, outlined in red.

The Sonora Pass Snowmobile Club board members regularly ride from the Iron Mountain Snopark and are very familiar with hwy 88. One of them lives in Markleeville. They have agreed to assist in a stewardship arrangement to sign a travel corridor, either on, adjacent to, or west of Schneider Cow Camp Rd in a manner that does not or only minimally and briefly crosses any routes used by the Kirkwood XC ski facility. Contact info can be provided if needed.

Remedy: Extend the Amador OSV area north of Caples Lake to the Caples Creek Wilderness Boundary. This would better enable the identification of a route for OSV passage to Sayles Canyon that neither conflicts with the Kirkwood XC special use permit, nor violate the current Forest Plan management or amendments. The county road will be used if this is not done, and conflicts will arise with the special use permittee.



#### Failure to adequately meet the Purpose and Need

The existing system of available OSV trails and areas on the Eldorado National Forest is the culmination of multiple agency decisions over recent decades. Public OSV use of the majority of this available system continues to be manageable and consistent with current travel management regulations. Exceptions have been identified, based on internal and public input and the criteria for designating roads, trails, and areas listed at 36 CFR §212.55. **These include needs to provide** *improved access for OSV uses* and enact prohibitions required by the Eldorado National Forest Land and Resource Management Plan (Forest Plan) and other management direction. These exceptions represent additional needs for change, and in these cases, changes are proposed to meet the overall objectives.

Objection: Not a single improvement to OSV access has been put forth in this plan, only further limitations with no resource or biological threat identified. It is only 'non-motorized access' given for the reasoning, when the document itself recognizes wide-spread, readily available non-motorized recreation opportunities throughout the Eldorado and adjacent forests.

In fact, as recognized in the Draft ROD:(Pg 6):

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.

Yet the FEIS and OSV plan proceeds to remove additional acreage from OSV legal riding areas, such as the area between Loon Lake and the Van Vleck Bunkhouse, access to Sayles Canyon, Wood Lake, and further pinching down OSV access between the Proposed Caples Creek Wilderness and Schneider Cow Camp Rd.

The Devil's Lake, McKinstry, Bryan Meadow, Little Indian Valley, Shadow Lake and Rockbound Semi-primitive non-motorized areas rely on the FS management prescription semi-primitive non-motorized, which is obviously in place to deal with summer travel only. The mention of limited motorized use mentions the the obliteration of roads that may facilitate non-permanent motorized access:

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#### 3 \* <u>Recreation Opportunity Spectrum -</u> Semiprimitive Nonmotorized

Areas managed to meet the ROS objective of Semiprimitive Nonmotorized, characterized by a predominantly natural or natural-appearing environment of moderate to large size. Interaction between users is low, but there is often evidence of other users. The area is managed in such a way that minimum on-site controls and restrictions may be present, but they are subtle. Permanent motorized vehicle use is not permitted. Temporary vehicle use may be authorized based on special needs, but only for the duration of the project, and where roads are then obliterated. Examples of special needs are insect salvage, vehicle and equipment access supported by an escaped fire situation analysis, and placement or removal of facilities under Special Use Permit.

4-35

OSV use does not require roads, and certainly not their obliteration afterwards. The ROS is woefully inadequate in dealing with winter, cross-country OSV use and is a summer use management strategy. In winter months, primitive semi-primitive non-motorized and any special interest area are functional equivalents and present a redundancy in management. Primitive (and semi-primitive non-motorized) designations are more than adequately represented by Wilderness, Proposed Wilderness, and special interest areas where non-motorized recreation is allowed, yet motorized is not. Also, the condition of winter is a non-permanent state, IE: OSV use does not fall into "permanent motorized vehicle use." OSV use only occurs under the special condition known as winter, a condition not in any way shape or form is adequately provided for in the ROS with regards to OSV use.

As mentioned in our previous comments, and repeated by the Eldorado Supervisor, there is no motorized use allowed in winter from either pass (Hwys 88 and 50), and the vast expanses of Desolation and Mokelumne Wilderness areas adequately meet objectives sought when additional closures such as that behind Adventure Mountain, Loon Lake, Van Vleck are put forth. These should be repealed in the final ROD.

A02

Remedy: Implement the strategies put forth in the objections in this document, including designating semi-primitive non-motorized areas as open to OSV use.. Begin discussions with the OSV community regarding Forest Plan revisions, and updates to ROS designations to accurately and reasonably address recreation in a winter context.

Respectfully;

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Kevin Bazar Sierra Snowmobile Foundation

From:	<u>kevin bazar</u>
To:	FS-objections-pacificsouthwest-regional-office
Cc:	Marsolais, Jennifer - FS; Crabtree, Laurence -FS
Subject:	ENF OSV Project
Date:	Monday, December 17, 2018 11:01:09 AM
Attachments:	SSF Eldorado objection.pdf

Below you will find objection comments pertaining to the Eldorado National Forest OSV project FEIS/draft ROD, released Oct 31, 2018.

Please confirm upon receipt.

Thank you.