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Comments: The 30' rule.

Two documents in the IA package mention a 30' rule;

"The wildlife closure area does not include any developed facilities or open trails, including winter trails. Winter trails remain open 30' beyond the groomed route."

David Farmer, Forest Supervisor. July 29 2026 announcement of EA

"The closure does not include any developed facilities or open trails, including winter trails. Winter trails remain open 30' beyond the groomed route."

I-90 SPE Wildlife Closure Area Draft EA_FONSI

None of the documents in this EA package provide guidance about implementation or enforcement of this 30' rule. This rule is a big deal for users and maintainers of trails to which it applies. Additional guidance would add useful clarity to this EA. (Or perhaps no guidance at all - read on.)

If the 30' rule is essential, additional guidance in the form of policy and practices must be added to the draft version of the EA package. Six numbered sections below elucidate the kind of information that would add clarity.

1) Width measurement: How is the thirty-foot distance measured? Would it be by using a steel tape, along the surface of the ground? Alternatively, might it be measured horizontally along a perpendicular plane from a vertical plane running along the edge of the trail? What happens when there's a steep bank or fall-off? Or 40' from the edge of the prepared roadbed? (next paragraph also relates to trail width)

2) Width of groomed route for winter trails. What does "groomed route" mean? Early in the winter, cross country ski trails are packed as closely as possible to a trail's packed surface. As depth of snowfall increases, the groomed width also increases. Snow piles up onto banks and moves down into ditches. The groomed surface can grow by ten feet or more. How is trail edge defined with respect to season width variation?

3) Demarcation and Enforcement. How will recreational users be made aware of the 30' boundary? Will there be signs at trailheads; at trail junctions; off trail blazing; signs indicating that a person is moving beyond the 30' rule.

How will enforcers and parties authorized by permit recognize the 30' boundary?

How will enforcement be conducted (frequency, methods, procedures)? Will the Forest Service and designated agencies issue warnings or tickets for violations? Will there be fines? Is there a target frequency for enforcement?

5) Updates to Existing Permits. Will Forest Service permits for winter and summer trail maintenance permits be updated to include the 30' rule?

6) Policies and Procedures. Will there be policies and procedures to deal with emergencies like wind-driven blowdown events or washouts caused by heavy rainfall? Or are these large scale events best handled on a one-off basis as they are today?

On one hand, this reviewer would like the Forest Service spell out rules necessary to implement and enforce the 30' rule. Following this track, EA authors need to write out what drives the need for a 30' rule and draft policies and procedures for public review. This new text must be added to one of the EA documents. This would require stopping this EA process, updating documents, re-releasing them, and restarting this draft review process.

On the other hand, this reviewer wonders if the 30' rule is necessary.

The total length and area of impact is small.

The roundup of reasonable suspects includes parents driving by that need to relieve themselves or dump a diaper; kids and child-like adults having a trail-side booze break; people unloading junk for which they don't want to pay dump fees; gun enthusiasts firing weapons too close to a public road or trail. These offenses break any number of laws promulgated by Forest Service and towns and counties having jurisdiction. These offenses will occur with or without a 30' rule.

This reviewer believes the intent of the 30' can be managed by signage. The 30' rule degrades into a simple and inexpensive policy: put up signs.

This reviewer believes the 30' rule is unnecessary and should be removed.