

# COUNTY OF EL DORADO

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April 2, 2013

Kathryn D. Hardy, Forest Supervisor  
Eldorado National Forest  
100 Forni Road  
Placerville, CA 95667

Subject: Travel Management Draft Supplemental Environmental Impact Statement

Dear Ms. Hardy:

In our previous letter responding to the Notice of Intent to prepare a Travel Management Supplemental Environmental Impact Statement, we expressed confidence in the Proposed Action, namely to 1) designate 13 routes for public motorized use determined to not cross meadows, 2) designate 11 routes that cross meadows but meet Standard and Guideline No. 100, and 3) amend the Eldorado National Forest Land and Resource Management Plan to allow continued public motorized use on 18 routes determined to not currently meet S&G 100. We continue to stress that these actions, now encapsulated in the Draft SEIS as Alternative 1, represent the only acceptable alternative for the citizens of the County of El Dorado.

We hope you agree that Alternative 2 (No Action) is not a practical alternative. Leaving all 42 routes closed while in light of field surveys indicate that 24 routes either do not cross meadows or cross meadows while meeting Standard & Guideline #100 would be draconian disservice to the public.

The financial position of the United States Forest Service must be a consideration with any alternative that proposes future NEPA analyses, corrective actions and mitigation measures. Alternatives 3 and 4 are difficult to evaluate because there is no discussion of the magnitude of mitigation potentially required on routes, or the priority of route mitigation if and when resources are available. Absent that information, it is difficult to determine whether the environmental benefits of leaving routes undesignated to some future date is sufficient to warrant the extremely negative recreational and economic consequences, especially for high country, high value recreation opportunities. The Forest Service must identify the scope of mitigation required for each route and the priority of route mitigation.

It is the Board of Supervisors strong belief that the Forest Service will not have required resources to accomplish the analyses and mitigation suggested through Alternatives 3 and 4.

With no funding to accomplish mitigation, leaving 18 undesignated for use until future NEPA analyses and mitigation measures are completed is akin to keeping the public off of these routes in perpetuity. Specifically, Alternative 3 forecloses on 14 of only 25 high country, high recreation value routes, which represents 73% of the total high country, high recreation routes. Alternative 4 appears even more severe, closing nearly all of the high country, high recreation value routes, including 15 routes or portions of routes that studies indicate do not cross border meadows, or do so while meeting Standard & Guideline #100. Moreover, both Alternatives 3 and 4 unacceptably close significant portions of routes not identified in the litigation.

The four most frequented Off Highway Vehicle (OHV) trails in the County of El Dorado include the Barrett Lake Trail (16E21), the Strawberry Creek Trail (17E73), the Deer Valley Trail (19E01) and the Rubicon Trail. Like the Rubicon, Strawberry Creek and Deer Valley trails are both highway connectors that facilitate recreational access in and out of the County. Closure of three of the “big four” OHV trails will undoubtedly result in increased use of the Rubicon Trail and Forest Service roads. The Forest Service is very aware of the County’s investment in the Rubicon Trail and our commitment to maintaining it.

The Draft SEIS does not analyze the cumulative environmental effect of restricting usage to a reduced number of available routes. In addition, the local economy will suffer as the supply for high country, high value OHV opportunities is diminished. Though the Forest Service has analyzed the recreational and environmental values of each of the 42 routes, no analysis of the economic and social value of the loss of these routes has been undertaken. Prior to closing any routes the Forest Service must analyze the economic and social impact to the County of El Dorado and plan to mitigate such impacts or abandon alternatives that close routes.

Another concern related the Rubicon Trail is the proposed closure of 14N39. This route is the only trail of the 42 at issue that has direct connection to the Rubicon Trail. The County has mitigated up to the beginning of 14N39 only to have the Forest Service propose closure. The Forest Service should not close this important route and should prioritize its opening.

Again, we strongly urge you to adopt Alternative 1. Considering the obvious and quantifiable consequences these route closures have on public safety and the cultural and economic impact to the citizens of the County, this is the only acceptable alternative.

Sincerely,

Ron Briggs, Chair  
Board of Supervisors  
County of El Dorado