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November 2, 2012

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

Re: Comments on Eldorado National Forest "42 trails SEIS Proposed Action"

Dear Ms. Hardy,

Thank you for the opportunity to comment on the SEIS proposed action on the "42 Routes Project"

I am pleased to note that Forest staff intends to re-open most of these routes based on initial assessment. I commend you and your staff for your diligent work on this project and frequent communication of progress.

I do have the following concerns:

With regard to the Richardson Lake Trail (14N39): This trail connects to the Rubicon Trail and is therefore of particular importance to me personally and all Rubicon Trail users. The Forest has made substantial efforts to make the Rubicon Trail accessible to the public in the last several years, and that effort lends credence to the importance of keeping this route open. My understanding is that the forest plans to close about half of this trail to the public, terminating it at Richardson Lake. The trail historically continues to the top of Sourdough Mountain, in use since at least the early 1970's, so has historic value to the road system. This stretch of the trail has consistent use by clubs, individuals and families. It has the best view of the Rubicon available anywhere. This underscores its value to the public and the need to keep it open. The short stretch of trail that goes through the meadow area rarely sees use during a period when it is wet. The area of concern is in an open area in which the sunlight melts the snow long before vehicles can get to it, because the snow stays late in the lower sections of the trail by the lake, limiting access. There is a SMUD radio facility at the top of Sourdough, in place since 2003, so the trail will see administrative use past the lake, and therefore will have to be maintained past the lake anyway. I would suggest the forest undertake mitigation/BMP's in the area of concern much like the county has done on Rubicon and ask that SMUD maintain it. A single correctly constructed BMP would restore and maintain meadow hydrology, prevent the road surface from eroding, require little ongoing maintenance, and insure continued public access to this valuable trail. Why should SMUD take financial responsibility to maintain a recreational trail? A better question is: why should SMUD be allowed to

build a facility on a trail that should be open to the public and rely on public dollars to maintain it for them? Please keep it open, mitigate it, and share costs with SMUD.

With regard to Strawberry 4WD Trail (17E73): It has come to my attention that this trail is being considered for “Barrett Lake style management” in which the trail is evaluated over the course of the season and opened only when the road surface is completely dry. I object to this management style for this trail for several reasons. This trail is not a destination trail like Barrett, it is a connector trail, meaning that it connects two other roads (Highway 50 and Highway 88), so it is important for it to be available as much of the season as possible. I am concerned that this will leave the trail open only a few weeks out of the year. I am concerned that this would drive recreation out of the area and therefore hurt the local economy, as well as displacing users to other routes, causing substantial impact to those routes and areas. The four most popular four wheel drive routes in the Eldorado National Forest are Strawberry, Deer Valley, Barrett, and Rubicon. If the Forest closes three out of the four for most of the season, I am concerned that the impact to the fourth, Rubicon, would be substantial. Because this action would drive users from these three federally managed trails to a trail managed by local government, I believe this would trigger a CEQA/NEPA violation in the absence of CEQA/NEPA analysis. I would suggest an Adopt-A-Trail strategy to help the forest maintain and build BMP’s if necessary to keep the trail open for the same duration as the balance of the roads in the forest.

With regard to Deer Valley 4WD Trail (09N83): It has come to my attention that this trail is also being considered for “Barrett Lake style management” in which the trail is evaluated over the course of the season and opened only when the road surface is completely dry. I object to this management style for this trail for several reasons. This trail is also not a destination trail like Barrett, it is a connected trail, meaning that it connects two other roads (Highway 4 and Highway 88), so it is important for it to be available as much of the season as possible. I am again concerned that this will leave the trail open only a few weeks out of the year. I am concerned that this would drive recreation out of the area and therefore hurt the local economy, as well as displacing users to other routes, causing substantial impact to those routes and areas. . The four most popular four wheel drive routes in the Eldorado National Forest are Strawberry, Deer Valley, Barrett, and Rubicon. Again, if the Forest closes three out of the four for most of the season, I am concerned that the impact to the fourth, Rubicon, would be substantial. Because this action would drive users from these three federally managed trails to a trail managed by local government, I believe this would trigger a CEQA/NEPA violation in the absence of CEQA/NEPA analysis. I would suggest an Adopt-A-Trail strategy to help the forest maintain and build BMP’s if necessary to keep the trail open.

Again, thank you for the opportunity to comment on the forest’s proposed action.

Sincerely,

John M. Arenz