

El Dorado County

Ray Nutting Supervisor District II 621-5651



Date: November 5, 2012

To: Members of the Board of Supervisors

## RE: BOS Agenda 11/6/12, #12-0474 (18) – USFS Proposed Travel Management SEIS

I would like to interject my thoughts on the USFS Proposed Travel Management SEIS

CLOVER VALLEY/Deer Valley TRAIL 4WD (09N83): The forest has proposed that this trail is to be possibly managed with a longer closure than typical, similar to the Barrett 4WD trail. This trail is a through route, from highway 4 to highway 88. If they were managed like Barrett would drive people to other trails or worse, out of the county to recreate. Suggest that this trail be managed using volunteers under an Adopt A Trail program, much like FOTR does with the County on Rubicon.

Strawberry 4WD Trail (17E73): Also being considered for a longer than typical winter closure, this trail is also a through route, from highway 88 to Highway 50. Again, if they were managed like Barrett would drive people to other trails or worse, out of the county to recreate. Suggest that this trail be managed using volunteers under an Adopt A Trail program, much like FOTR does with the County on Rubicon.

Richardson Lake (14N39): The forest plans to close this trail past the Richardson Lake. Though Richardson Lake is a destination, it is not the ONLY destination on this trail. The top of Sourdough Mountain is also a destination for its fantastic views. The area of concern is in a higher altitude are that is open and has substantial sunlight on it early in the season, so the snow melts early there and has time to dry out before the lower sections are accessible because of snow accumulation. The route past Richardson Lake is not going to be eliminated, but kept for administrative access for the repeater at the top of Sourdough. Though I can see why SMUD should not be wholly responsible for maintaining the route, the route has been open to the top from at least the early 1970's. SMUD built their facility there in 1991. This route should be first and foremost a forest road with access for the public and secondarily an administrative route for SMUD's use. Suggest the forest rock line the 100 foot section of trail that goes through this dry meadow, much like the County has done on Rubicon, and maintain it using an Adopt A Trail plan. This is an important trail to Rubicon users and to Tahoe based 4WD clubs, and could be left open with help from FOTR and these clubs.

In my view of the documents, maps, and discussion with USFS personnel, I have the following comments:

The only two roads proposed for the closure, as listed in the Travel Management SEIS-Rev.10/11/12, are the following:

## 1. Portion of 09N54 (Leoni Meadows)

Apparently no right of way exists on this portion of this roadway, which is a private property rights issue, which in my view should be honored.

## 2. Portion of 14N39 (Richardson Lake)

As was discussed at the BOS last week, the USFS did not propose any mitigation for any possible impacts for the continued use of this or any other roads which are proposed for closure. According to the USFS, to re-scope the environmental document, to include mitigation, would apparently further delay the environmental process an additional 1 to 2 years. As a result, no corrective measures are proposed to keep these roads open as part of this environmental process.

I find it questionable that the overall environmental process would be delayed 1 to 2 years to what most likely amounts to providing alternative mitigations to keep this and only this portion of roadway open as part of the overall process.

I would presume SMUD has maintenance rights to this road to access and maintain their facility. According to John Arenz, placing rock on the roadway would most likely mitigate any existing impacts, which has been a common BMP used on the Rubicon Trail. Would the USFS consider a shared use agreement between SMUD and the County or any number of users groups like the Rubicon Trails Foundation, for the on-going maintenance of this section of roadway so as to not impact the meadow?