



California Association of Four Wheel Drive Clubs, Inc.

Over 50 years advocating for recreation

California Department of Parks and Recreation
Off-Highway Motor Vehicle Recreation Division
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Cc: Eldorado National Forest
Kathy Hardy, Forest Supervisor khardy@fs.fed.us
Jon Jue, Project Administrator jjue@fs.fed.us

March 31, 2013

Re: USFS - Eldorado National Forest Grant Application Reference # G12-02-03-P03

Dear Grant Committee:

These comments are submitted on behalf of the California Association of 4 Wheel Drive Clubs (CA4WDC) and its membership. CA4WDC represents clubs and individuals within the State of California that are part of the community of four-wheel drive enthusiasts. Many of our members and supporters live in and/or recreate in the area covered by the *Eldorado National Forest Grant Application # G12-02-03-P03*. This document shall not supplant the rights of other CA4WDC agents and organizational or individual members from submitting their own comments and the agency should consider and appropriately respond to all comments received to this proposed grant.

While the main focus of CA4WDC is to protect, promote, and provide for motorized recreation opportunities on public and private lands, many of our members participate in multiple forms of recreation; including but not limited to hunting, fishing, camping, hiking, horseback riding, bicycle riding, and gem and mineral collection.

We recognize the positive health and social benefits that can be achieved through outdoor activities. We also recognize that motorized recreation provides the small business owners in the local communities a significant financial stimulus. And, our members are directly affected by management decisions concerning public land use.

Our members subscribe to the concepts of: 1) public access to public lands for their children and grandchildren; 2) condition and safety of the environment; and 3) sharing our natural heritage. The general public desires access to public lands now and for future generations.

This project is to complete the environmental analysis and planning for repair of meadows impacted by seven routes located within the Eldorado National Forest (ENF). These routes have affected the hydrologic connectivity within meadows along the routes, in that they divert, intercept or disrupt surface and/or subsurface water flow within the meadows. These routes are



among 42 routes that were designated for public motorized use in the 2008 Travel Management Environmental Impact Statement (EIS) and Record of Decision (ROD), but were found in a recent Federal Court ruling to have not been properly analyzed in light of compliance with a standard and guideline (S&G) dealing with maintaining hydrologic connectivity within meadows.

The ENF is currently supplementing the 2008 EIS to reconsider that portion of the EIS relating to Riparian Conservation Objective (RCO) #2, S&G 100 pertaining to the meadows on the 42 routes that were subsequently closed under court order. S&G 100 states: "Maintain and restore the hydrologic connectivity of ... meadows ... by identifying roads and trails that intercept, divert, or disrupt natural surface and subsurface water flow paths. Implement corrective actions where necessary to restore connectivity." The ENF released a draft supplemental EIS (SEIS) on February 20, 2013 and anticipates a final decision during Summer 2013.

Depending on the final decision made in the SEIS, the planning project described here will analyze for the specific corrective measures needed to assure that these routes are not affecting hydrologic connectivity within the meadows. This analysis is not included as a part of the SEIS. The environmental analysis proposed will involve, as appropriate, a hydrologist, aquatic biologist, trails engineer, wildlife biologist, botanist, archaeologist, soil scientist and recreation specialist. The product will be to conduct an analysis consistent with the National Environmental Policy Act (NEPA) and will involve public notice and involvement, interdisciplinary team analysis, and preparation of one or more environmental documents.

Of the 42 routes, 24 were found to either not cross a meadow or to not be impacting hydrologic connectivity within meadows. This planning proposal addresses 7 of the more popular routes which cross meadows and are affecting hydrologic connectivity within the meadows.

Though CA4WDC does not support the draft supplemental EIS (SEIS) selected alternative as "preferred alternative" that would designate a smaller portion of the routes for initial use and conditionally designate some of the routes for vehicle travel, based on the finding that specified trail maintenance or mitigation projects must be completed before the public can resume vehicle travel. The Meadow Routes should remain open in a "modified preferred alternative" for the following reasons:

- The routes were originally designated by Forest's Travel Management Plan approved in 2008.
- The "meadow routes" should be included in the modified preferred alternative since those routes are an integral part of the minimally functional network of motorized trails proposed for designation in the 2008 FEIS/RO.
- The routes represent the bare remaining "minimal" thread of access to important destinations or system road/trail components, which through even the interim closure imposed by the Court resulted in greater impacts to legitimate public recreation than was reflected by the route mileage of the 42 routes alone.
- Establish an interim "wet weather/seasonal closure" plan for the 42.4 miles of trails that do not meet Standard and Guideline 100 which would allow the trails to be part of the Forest's Travel System.



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- Conditionally designate the trails "Open" once a new interim wet weather/seasonal closure plan is adopted.

Though CA4WDC suggests these changes to the draft supplemental EIS (SEIS) selected "preferred alternative" we also support the Eldorado Forests need for this grant to complete the mitigation measures on these routes. Many of our members and member clubs will partner with the Eldorado National Forest to implement the mitigation measures. For these reasons CA4WDC supports this grant request.

CA4WDC appreciates the opportunity to comment on this grant request made by the Eldorado National Forest. CA4WDC is eager to assist land managers and we hope these comments have been helpful in the importance of this grant to our members and member clubs. If addition information is required please do not hesitate to contact Steve Egbert at (559) 936-3030.

Thank you,

A handwritten signature in black ink, appearing to read "Steve Egbert".

Steve Egbert
President, CA4WDC