



October 22, 2007

Sent via Email and U. S. Mail

Jason Nedlo, Team Leader  
Eldorado National Forest  
100 Forni Road  
Placerville, CA 95667

RE: Public Comments to the Eldorado National Forest Public Wheeled Motorized Travel Management Draft Environmental Impact Statement

Dear Mr. Nedlo:

Please accept this document as public comments from the office of Don Amador, Western Representative for the BlueRibbon Coalition (BRC) regarding the Eldorado National Forest Public Wheeled Motorized Travel Management Draft Environmental Impact Statement (DEIS) . This letter shall not supplant the rights of individual BRC members, agents, or contractors from submitting their own comments on the DEIS.

BRC does hereby incorporate by reference the following correspondence dated August 2, September 6, and October 22 from Moore, Smith, Buxton & Turcke on the various and substantive procedural, administrative, and legal flaws in the DEIS including but not limited to the arbitrary dismissal of BRC's "Alternative R". BRC shall not reiterate said comments but add several additional issues for further analysis.

#### ISSUE ONE – Maintenance Costs of NFS Motorized Trails

BRC believes the DEIS based some of its rationale for reducing existing or proposed NFS trail mileage on the last 5-7 years of almost non-existent trail-related OHV grant funding from the California Off-Highway Motor Vehicle Recreation (OHMVR) Trust Fund to the Eldorado National Forest. Without discussing that rather unpleasant chapter of the OHMVR Program, the Governor of California signed SB742 into law on October 12, 2007.

BRC believes that many of the DEIS's concerns related to designating certain routes because of the ... *"inability to maintain and enforce..."* OHV related management prescriptions on said routes could now be largely unfounded because of a rather substantive increase of sustained funding for OHV activities in SB742.

ISSUE TWO - October 16, 2007 Amador County Resolution

On October 16, 2007, the Amador County Board of Supervisors passed a resolution (*see attachment*) regarding the DEIS and public access to the Eldorado National Forest. BRC wants to ensure that the Eldorado National Forest is following administration directives and has actively considered designation of Federal and non-federal cooperating agencies in the preparation of analyses and documentation required by the National Environmental Policy Act (NEPA), and to ensure that Federal agencies actively participate as cooperating agencies in other agency's NEPA processes. The CEQ regulations addressing cooperating agencies status (40 C.F.R. §§ 1501.6 & 1508.5) implement the NEPA mandate that Federal agencies responsible for preparing NEPA analyses and documentation do so "in cooperation with State and local governments" and other agencies with jurisdiction by law or special expertise. (42 U.S.C. §§ 4331(a), 4332(2)).

BRC requests that your agency analyze and respond to the aforementioned county resolution in the SEIS or FEIS.

As you know, BRC and/or our partners have long been supportive of responsible OHV recreation on the Eldorado National Forest. Such support has been in the form of volunteer trail efforts, OHMVR grants, and other projects. BRC believes the agency has the ability to develop a sustainable and substantive recreational road and trail network that both protects the resource and provides for a quality OHV experience.

BRC respectfully thanks the agency for reviewing our comments. BRC and our members look forward to working with the agency on this and future projects.

Sincerely,



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Attachment

